

FILED 7 JUN 16 15:42 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

3:16-CR- 00243-BR

v.

INFORMATION

GARY HOLSTROM,

16 U.S.C. §§ 3372(a)(1), 3373(d)(2)

Defendant.

THE UNITED STATES ATTORNEY ALLEGES:

COUNT 1

(Lacey Act)

(16 U.S.C. §§ 3372(a)(1), 3373(d)(2))

On or about the dates listed below, in the District of Oregon, the defendant, **GARY HOLSTROM**, did knowingly sell the wildlife identified below, which in the exercise of due care **HOLSTROM** should have known to have been possessed, transported, or sold in violation of a law, treaty, or regulation of the United States, to wit the Endangered Species Act of 1973 (“ESA”), 87 Stat. 884, 16 U.S.C. § 1531 *et seq.*, and implementing regulations; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”), 27 U.S.T. 1087 (Mar. 3, 1973), and implementing regulations; and 18 U.S.C. § 545 (prohibiting the smuggling of goods into the United States), as indicated below:

Date of Sale	Description of Wildlife	Law, Treaty, or Regulation Violated	Country of Origin	Sale Price
5/31/2011	Langur skull (<i>Presbytis</i>)	CITES (app. II)	Malaysia	\$228
9/4/2012	Macaque skull	CITES (app. II)	Malaysia	\$598
10/25/2012	Macaque skull with Bear claws	CITES (app. II)	Malaysia	\$424

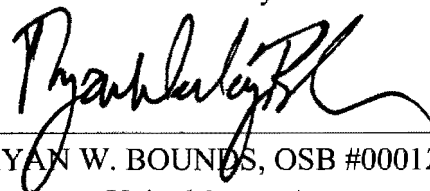
12/1/2012	Macaque skull	CITES (app. II)	China	\$200
12/27/2013	Loris skull	CITES (app. II)	Thailand	\$155
7/1/2014	Macaque skull	CITES (app. II)	Thailand	\$365
7/1/2014	Southern Cassowary bird head	18 U.S.C. § 545	Indonesia	\$400
7/1/2014	Turtle shell (<i>Testudines</i>)	CITES (app. II)	Malaysia	\$2,100
7/1/2014	Two (2) Orangutan skulls	ESA/CITES (app. I)	Malaysia	\$4,700

all in violation of Title 16, United States Code, Sections 3372(a)(1) and 3373(d)(2).

Dated this 7th day of June 2015.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney



RYAN W. BOUNDS, OSB #00012
Assistant United States Attorney