UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

FOR THE D	ISTRICT	MITCHELL D
UNITED STATES OF AMERICA,)	MITCHELL R. ELFERS CLERK
Plaintiff,)	CRIMINAL NO. 21-0591 MV
vs.)	Counts 1-3 and 5-7: 16 U.S.C. §§ 703 and 707(b)(2): Sale and Offer for Sale of
GEORGE TOM SKEET,)	Any Migratory Bird;
Defendant.)))	Count 4: 16 U.S.C. § 668(a): Bald and Golden Eagle Protection Act (Class A
)	Misdemeanor).

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

On or about January 18, 2019, in Bernalillo County, in the District of New Mexico, the defendant, GEORGE TOM SKEET, knowingly and without permission, sold and offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, red-tailed hawk (Buteo jamaicensis) feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

Count 2

On or about January 28, 2019, in Bernalillo County, in the District of New Mexico, the defendant, GEORGE TOM SKEET, knowingly and without permission, offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, red-tailed hawk (Buteo jamaicensis) feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

Count 3

On or about February 4, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **GEORGE TOM SKEET**, knowingly and without permission, offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, crested caracara (*Caracara cheriway*) feathers, golden eagle (*Aquila chrysaetos*) feathers, and bald eagle (*Haliaeetus leucocephalus*) feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

Count 4

On or about February 5, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **GEORGE TOM SKEET**, knowingly and without permission, sold and offered to sell the feathers of birds protected by the Bald and Golden Eagle Protection Act, specifically, golden eagle (*Aquila chrysaetos*) feathers, and bald eagle (*Haliaeetus leucocephalus*) feathers.

In violation of 16 U.S.C. § 668(a).

Count 5

On or about February 13, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **GEORGE TOM SKEET**, knowingly and without permission, offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, red-tailed hawk (*Buteo jamaicensis*) feathers, and Harris's hawk (*Parabuteo unicinctus*) feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

Count 6

On or about March 20, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **GEORGE TOM SKEET**, knowingly and without permission, offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, red-tailed hawk (*Buteo jamaicensis*)

feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

Count 7

On or about April 10, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **GEORGE TOM SKEET**, knowingly and without permission, offered to sell feathers protected by the Migratory Bird Treaty Act, specifically, Cooper's hawk (*Accipiter cooperii*) feathers.

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

FORFEITURE ALLEGATIONS

Upon conviction of Counts 1-3 and 5-7, as alleged in this Indictment, the defendant, **GEORGE TOM SKEET**, shall forfeit to the United States, pursuant to 16 U.S.C. §§ 703 and 706, any interest he may have in the following seized property, including the feathers of:

- (a) red-tailed hawk (*Buteo jamaicensis*) feathers,
- (b) crested caracara (Caracara cheriway) feathers,
- (c) Harris's hawk (*Parabuteo unicinctus*),
- (d) golden eagle (*Aquila chrysaetos*) feathers,
- (e) bald eagle (*Haliaeetus leucocephalus*) feathers, and
- (f) Cooper's hawk (*Accipiter cooperii*) feathers.

Upon conviction of Count 4, as alleged in this Indictment, the defendant, **GEORGE TOM SKEET**, shall forfeit to the United States, pursuant to 16 U.S.C. § 668(b) and 28 U.S.C. § 2461, any interest he may have in the following seized property, including the feathers of:

- (a) golden eagle (*Aquila chrysaetos*) feathers, and
- (b) bald eagle (*Haliaeetus leucocephalus*) feathers.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney