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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2012 Grand Jury

UNITED STATES OF AMERICA, ) CR CR12-0841  
Plaintiff, ) I N D I C T M E N T  
v. ) [16 U.S.C. §§ 3372(d) and  
KUDURA CLARK, ) 3373(d)(3): False Labeling of  
Defendant. ) Wildlife in Foreign Commerce;  
 ) 18 U.S.C. § 554: Smuggling Goods  
 ) Outside the United States;  
 ) 16 U.S.C. § 668(a): Unlawful  
 ) Export and Transport of Bald and  
 ) Golden Eagles; 16 U.S.C. §§ 703,  
 ) 707(a): Illegal Possession and  
 ) Transportation of Migratory  
 ) Birds; 18 U.S.C. § 2(b): Causing  
 ) an Act to be Done]

The Grand Jury charges:

COUNT ONE

[16 U.S.C. §§ 3372(d), 3373(d)(3)]

On or about December 14, 2007, in Los Angeles County, within the Central District of California, defendant KUDURA CLARK ("CLARK"), knowingly made and submitted a false record and label for wildlife that defendant CLARK intended to export and transport in foreign commerce. Specifically, defendant CLARK made and submitted a false written record and label that

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1 indicated that a package being shipped from the United States to  
2 Canada contained native art, when, in fact, as defendant CLARK  
3 well knew, the package contained two pairs of golden eagle wings,  
4 two pairs of golden eagle talons, and one pair of bald eagle  
5 talons.

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COUNT TWO

[18 U.S.C. § 554]

On or about December 14, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUDURA CLARK fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States, merchandise, namely, two pairs of golden eagle wings, two pairs of golden eagle talons, and one pair of bald eagle talons, contrary to law.

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COUNT THREE

[16 U.S.C. § 668(a); 18 U.S.C. § 2(b)]

On or about December 14, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUDURA CLARK ("CLARK"), knowingly and with wanton disregard for the consequences of his acts, exported, transported, and willfully caused to be exported and transported, from the United States to Canada, two pairs of golden eagle wings, two pairs of golden eagle talons, and one pair of bald eagle talons without a permit.

\* \* \* \*

It is further alleged that on or about May 26, 2011, defendant CLARK sustained a conviction in the United States District Court for the Eastern District of California for a violation of Title 16, United States Code, Section 668(a), in case number 1:10CR00300-001.

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COUNT FOUR

[16 U.S.C. §§ 703, 707(a), 50 C.F.R. § 10.13]

On or about December 14, 2007, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUDURA CLARK knowingly and unlawfully possessed, delivered for shipment, shipped, exported, and caused to be transported, two pairs of golden eagle wings, two pairs of golden eagle talons, and one pair of bald eagle talons, all without a permit.

A TRUE BILL

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Foreperson

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United States Attorney

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