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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 BROOKLYN

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4 UNITED STATES OF AMERICA,

5 - against -

6 GERARD KRUSE,

7 Defendant.

8 -----X

INFORMATION
CR 15 - 207
Cr. No.
(16 U.S.C. §§ 3372(a)(1),
3372(a)(2)(A), 3373(d)(2)
and 18 U.S.C. § 2)

JOHNSON, J.
BLOOM, M.J.

9 THE ASSISTANT ATTORNEY GENERAL OF THE
10 ENVIRONMENT AND NATURAL RESOURCES DIVISION OF
11 THE UNITED STATES DEPARTMENT OF JUSTICE CHARGES:
12

13 At all times material to this Bill of Information, and incorporated by reference in all counts:
14

15 **THE DEFENDANT**

16 1. The defendant is GERARD KRUSE. He is a resident of Oviedo, Florida. During the
17 time of the charged conduct, KRUSE lived in Douglaston, New York.

18 **COUNT ONE - ILLEGAL TRANSPORT OF WILDLIFE**

19 2. On or about July 19, 2009, in Douglaston, New York, in the Eastern District of New
20 York, and elsewhere,

21 GERARD KRUSE

22 the defendant herein, did knowingly transport wildlife, to wit: three corn snake eggs (*Elaphe*
23 *guttata guttata*), an endangered species under New Jersey law, in interstate commerce from New
24 Jersey to Douglaston, New York, while knowing, and in the exercise of due care he should have
25 known, that the wildlife was taken in violation of New Jersey law, to wit: N.J.S.A. 23:2A-6.
26

27 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2).
28

COUNT SIX - ILLEGAL TRANSPORT OF WILDLIFE

1
2 7. On or about June 15, 2010, in Douglaston, New York, in the Eastern District of New
3 York, and elsewhere,

4
5 GERARD KRUSE

6 the defendant herein, did knowingly transport wildlife, to wit: one pregnant Northern pine snake
7 (*Pituophis melanoleucus melanoleucus*), a threatened species under New Jersey law, and one
8 Eastern kingsnake, a species of special concern under New Jersey law, in interstate commerce
9 from New Jersey to Douglaston, New York, while knowing, and in the exercise of due care he
10 should have known, that the wildlife was taken in violation of New Jersey law, to wit: N.J.S.A.
11 23:2A-6.
12

13 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2).
14

15 **COUNT SEVEN - ILLEGAL TRANSPORT OF WILDLIFE**

16 8. Between July 22, 2010, and April 30, 2011, in Douglaston, New York, in the Eastern
17 District of New York,

18
19 GERARD KRUSE

20 the defendant herein, did knowingly transport and caused to be transported wildlife, to wit: seven
21 Northern pine snakes (*Pituophis melanoleucus melanoleucus*), a threatened species under New
22 Jersey law, in interstate commerce from Douglaston, New York, to locations in Arizona,
23 California, Pennsylvania, and Texas, while knowing, and in the exercise of due care he should
24 have known, that the wildlife was taken in violation of New Jersey law, to wit: N.J.S.A. 23:2A-
25 6.
26

27 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2).
28

COUNT EIGHT - ILLEGAL RECEIPT OF WILDLIFE

1
2 9. On or about January 18, 2011, in Douglaston, New York, in the Eastern District of
3 New York,

4
5 GERARD KRUSE

6 the defendant herein, did knowingly receive wildlife, to wit: seven California mountain
7 kingsnakes (*Lampropeltis zonata*), a sensitive species under Oregon law, that were shipped in
8 interstate commerce from Eugene, Oregon, to Douglaston, New York, while knowing, and in the
9 exercise of due care he should have known, that the wildlife was taken in violation of Oregon
10 law, to wit: O.A.R. 635-044-0130.

11
12 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2).

13
14 **COUNT NINE - ILLEGAL TRANSPORT OF WILDLIFE**

15 10. On or about December 4, 2011, in Douglaston, New York, in the Eastern District of
16 New York,

17
18 GERARD KRUSE

19 the defendant herein, did knowingly transport, to wit: three California mountain kingsnakes
20 (*Lampropeltis zonata*), a sensitive species under Oregon law, in interstate commerce to a person
21 in Nottingham, Maryland, while knowing, and in the exercise of due care he should have known,
22 that the wildlife was taken in violation of Oregon law, to wit: O.A.R. 635-044-0130.

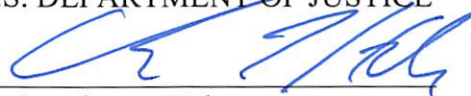
23
24 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2).

1 federal law prohibiting the mailing of snakes and venomous reptiles, to wit: 18 U.S.C. § 1716(a)
2 and 39 C.F.R. § 111.1, USPS Domestic Mail Manual at 601, ¶8.4, USPS Publication 52 at 211,
3 525.3.

4 All in violation of the Lacey Act, 16 U.S.C. §§ 3372(a)(1), 3373(d)(2).

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10 Dated: April 23, 2015

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JOHN C. CRUDEN
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