

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL DOCKET NO. 14-181**

v. * **SECTION: "C"**

LAWRENCE TREIGLE *

* * *

FACTUAL BASIS

The defendant, **LAWRENCE TREIGLE** ("**TREIGLE**"), has agreed to plead guilty as charged to count one of the one-count Bill of Information. Count one charges **TREIGLE** with conspiring to smuggle turtles from the United States, in violation of Title 18, United States Code, Section 554; all in violation of Title 18, United States Code, Section 371.

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information:

In June 2013, investigators with the United States Fish and Wildlife Service (USFWS), United States Postal Inspection Service (USPIS), and United States Department of Homeland Security, Homeland Security Investigations (HSI) began investigating **TREIGLE** for illegally exporting turtles. Initial research showed that **TREIGLE** had a Facebook page titled "Lawrence Turtleman" and that **TREIGLE** had several photographs of baby and adult turtles posted on his Facebook page. Three of the turtles were given a preliminary identification as Eastern Box, Mediterranean Spur-Thighed Tortoise, and African Spurred Tortoise. **TREIGLE's** Facebook page had several groups associated with it indicating the sale of reptiles including; Reptiles,

Exotics, and Other pets for sale, Low Country Online Auction, and Reptiles and Redheads.

Investigators also checked law enforcement databases for records related to **TREIGLE**. The USFWS law enforcement database had one result for **TREIGLE**. In 2004-2005, **TREIGLE** was targeted by USFWS in an illegal interstate commerce scheme selling and bartering illegally captured North American Wood turtles (*Glyptemys Insculpta*). Agents executed a search warrant on the residence of the main target of the investigation, J. T., and a computer was seized. Emails between J. T. and **TREIGLE** showed that both had knowledge that their activities were unlawful. That investigation revealed that J.T. was capturing the North American Wood Turtles from the wild and that **TREIGLE** was brokering deals for sale and barter of the turtles. **TREIGLE** would then send J.T. his share of the proceeds from the sale. USFWS agents conducting the investigation were preparing an application for a search warrant on **TREIGLE's** home, but Hurricane Katrina made landfall in New Orleans area before the warrant was finalized. **TREIGLE** was never contacted about that investigation; however, J.T., was convicted of Lacey Act charges in Pennsylvania. *United States v. J.T.*, W.D. Pa., Crim. No. 05-258. In June 2006, J.T. was sentenced to serve one year and one day in prison.

In the preliminary stages of the instant investigation, the government subpoenaed records related to **TREIGLE's** bank accounts at First NBC Bank. Those records show that on November 15, 2011, **TREIGLE** opened account #XXXX9025. In addition to the account ending 9025, **TREIGLE** had two other bank accounts with First NBC Bank with account numbers ending in 7701 and 2837. **TREIGLE** informed a bank branch associate that the 9025 account was set up solely to receive incoming wires because he did not want to give out his personal account number. **TREIGLE** stated he was selling various items on the internet. An

analysis of **TREIGLE's** accounts at First NBC revealed that between November 2011 and October 2012, **TREIGLE** received approximately \$206,500 in 16 incoming wire transfers from Hong Kong, China. Each of these wires was sent by or on behalf of H.K.L., aka J.L., aka DAVE LNU and/or H.Y.B.W., aka H.M., aka B.W. Further subpoenaed financial records revealed that from October 2011 through May 2013, **TREIGLE** received funds in various amounts totaling \$19,624.93 from a PayPal account registered to him. These funds were sent by or on behalf of H.K.L., aka J.L., aka DAVE LNU and/or H.Y.B.W., aka H.M., aka B.W. Combined, the wires and PayPal transfers total \$221,780.00.

Subpoenaed financial records also revealed that **TREIGLE** had many charges on his credit card from the United States Postal Service. A USPS inspector gathered information related to these charges and shipments made by **TREIGLE** from November 2011 to November 2012. Over this one year period, **TREIGLE** used the USPS Express Mail system 42 times. 41 of the 42 Express Mail shipments had the Slidell address of a rental home owned by **TREIGLE** or a slight variation thereof posted as a return address. Specifically, he used 6549 Lauren Drive 11 times, 6540 Lauren Drive 3 times, 6541 Lauren Drive 1 time, 6548 Lauren Drive 13 times, and 6544 Lauren Drive 13 times. During the November 2011 to November 2012 time period, **TREIGLE** shipped to several different addresses, but two addresses were shipped to 35 times. 13 shipments were sent to J.T., XXX 11th St. Charlera, PA 15022, and 22 shipments were sent to A.W., XXXX Newby Ave. Rosemead, CA 91770. As noted above, **TREIGLE** was previously involved in an illegal turtle smuggling scheme with J.T. for which J.T. was convicted of Lacey Act violations and sentenced to a year and a day in prison. The investigation revealed that A.W. serves as a drop location in California for unlawful turtle shipments that are later smuggled to

Hong Kong using a common carrier, thereby circumventing the official export channels.

The mailing records show that the shipping costs and weights of the shipments sent to A.W. were of a significantly higher amount than the shipments made to J.T. This pattern demonstrates how the scheme works: the larger, heavier boxes sent to A.W. contain the turtles, while the smaller packages sent to J.T. contain cash obtained by **TREIGLE** from the proceeds for the illegal turtle sales. By comparing dates and times from USPS records with the records subpoenaed from financial institutions, investigators were able to see a correlation between payments from the turtle buyers and shipments of money and turtles. Specifically, **TREIGLE** receives a payment for a brokered sale, generally via wire from Hong Kong or PayPal. **TREIGLE** then removes cash from his account, and a short time after this withdrawal, sends out two packages. One package is sent to A.W. (or another co-conspirator who also serves as a drop location in California) and a second to J.T. in Pennsylvania. The one to A.W. is turtles, as evidenced by the large weights (and later confirmed through the interception of shipments and admissions of **TREIGLE** and J.L.). The second to J.T. is cash or money orders, as evidenced by the lighter weight and the near-time withdrawals of cash observed in **TREIGLE**'s bank accounts (and later confirmed through the interception of shipments and admissions of **TREIGLE**).

In early 2014, USPIS inspectors in California—who had no knowledge of the investigation into **TREIGLE**—intercepted a package sent by **TREIGLE** to A.W. A.W. was contacted by USPIS inspectors and gave consent to search the package, stating that there were only turtles inside. Inside the box, inspectors found 11 adult North American Wood turtles that were wrapped with duct tape and bundled in cloth bags to eliminate movement during shipment. The mailing label had the return address of 6540 Lauren Drive, Slidell, LA, which is a variant of

the address of **TREIGLE**'s rental property. USPIS inspectors also located two corresponding Express Mail shipping labels from **TREIGLE** to J.T. on January 14th and 15th, days before **TREIGLE** mailed out the parcel of turtles to A.W. As with the other shipments, the shipping costs and weights of the shipments sent to A.W. were of a significantly higher amount than the shipments made to J.T. **TREIGLE** spent \$148.70 in postage on the parcel to A.W., which contained the eleven turtles and weighed 26.40 pounds. The two Express Mail flats **TREIGLE** mailed to J.T. weighed 2.5 ounces and 3 ounces, respectively.

USFWS investigators conducted a short interview with A.W., who was actually identified as S.Y.C. A.W. stated that she purchased the turtles from **TREIGLE** on January 16, 2014, and paid \$4750.00 in the form of a bank transfer. A.W. sent an email to USFWS Special Agent Laura Chee on January 22, 2014 explaining the purchase of the turtles and including a homemade invoice. The email says that since the turtles came from Louisiana, and not a state where the turtles are protected, then the shipment is totally legal. A.W. explained that she purchased the turtles from **TREIGLE** through an online website named Faunaclassifieds.com,¹ and her plans were to sell the turtles at a Reptile show in Arizona.

Contrary to A.W.'s statement to agents, the shipment of turtles she received from **TREIGLE** was not in fact legal because (1) the turtles were captured from the wild in Pennsylvania, and Pennsylvania law prohibits the capture of any North American Wood turtles from the wild, and (2) **TREIGLE** is not licensed in Louisiana to sell, transport, or export turtles and so his shipments of turtles from Louisiana to California were illegal. Also contrary to

¹ Faunaclassifieds.com is a known website for the sale or barter of reptiles. These types of websites are a central location where reptile traders, both legal and illegal, go to facilitate their trade. These sites provide anonymity to users and are often used to facilitate illegal activity and specifically illegal trade in turtles.

A.W.'s statement, **TREIGLE**'s bank records do not reflect a payment from A.W. on or near January 16, 2014, in the amount of \$4,750, but do show a wire transfer from Hong Kong of \$9,473 on January 14, 2014.

During the course of the investigation, agents conducted surveillance of **TREIGLE**'s home at XXX Stephanie Lane, Covington, Louisiana, from public areas near the home and through a fly over. During the summer months of 2013, agents observed building materials on the driveway of the residence. **TREIGLE** was constructing large cinder block enclosures beside the house. Investigators identified these structures as enclosures commonly used to hold turtles. On May 6, 2014, aerial surveillance was conducted to get an updated view of the holding pens. The flight confirmed that **TREIGLE** was using the pens to house turtles. While conducting surveillance from public areas, investigators were able to view the inside of **TREIGLE**'s garage. The garage is not used to store vehicles, and instead houses stackable, clear plastic containers and aquariums. These containers and aquariums are commonly used to hold turtles. Agents also set up a pole camera that recorded the front of the house and showed **TREIGLE** entering and exiting his vehicle. After intercepting the package of turtles that **TREIGLE** sent to A.W. on January 21, 2014, agents reviewed the pole camera footage and observed **TREIGLE** departing his residence holding the box sent to A.W. minutes before he mailed the box from the U.S. Post Office in Madisonville, LA. Agents were able to match similar pole camera footage from other days to four other known shipments.

In June 2014, investigators received records from Federal Express (FedEx) related to shipments sent and received by **TREIGLE**. Records received from FedEx confirmed that **TREIGLE** also used FedEx to transport turtles and had switched from USPS Express Mail to

FedEx following the interception by investigators of his January 21, 2014 shipment to A.W. FedEx records show that **TREIGLE** sent a package of turtles on April 15, 2014, to "Ken Lau" XXXX Remer St., South El Monte, CA 91733. The parcel bearing FedEx tracking number 802278163370, weighed twenty-two (22) pounds, and again **TREIGLE** used the sender address of 6544 Lauren Dr., Slidell, LA 70460. Scrutiny of the shipping label by investigators found that the contact number used for "Lau" was actually the contact number for A.W., confirming that **TREIGLE** and A.W. were transporting turtles again. **TREIGLE** sent an additional 4 packages of turtles from April 24, 2014, through May 29, 2014, to "Kary Lee" in California. The addresses used for Lee, Lau, and A.W. are all located within a few miles of each other in the same area of California.

In June 2014, agents received additional, updated banking records from First NBC Bank. The records showed that **TREIGLE** opened a new account #XXXX9374 with First NBC Bank on January 10, 2014. Between January 10, 2014 and June 2014, **TREIGLE** received 7 foreign wires totaling \$67,348.00 into this account. The wires correspond with the dates and times of the shipments sent to Lee, Lau, and A.W. The senders of the wires were the same persons that **TREIGLE** had been receiving money from since 2011. Each of these wires was sent by or on behalf of H.K.L., aka J.L., aka DAVE LNU and/or H.Y.B.W., aka H.M., aka B.W.

On June 25, 2014, the government sought a search warrant to search **TREIGLE's** home at XXX Stephanie Lane Covington, LA, and a seizure warrant to seize funds in **TREIGLE's** First NBC Bank account #XXXXX9374. The Honorable Karen Wells Roby, United States Magistrate Judge for the Eastern District of Louisiana, signed both warrants on June 26, 2014, and agents executed them later that day.

In the course of executing the search warrant, agents initiated a conversation with **TREIGLE**. Although he was never in custody, agents nonetheless read **TREIGLE** his *Miranda* rights. After acknowledging those rights, **TREIGLE** agreed to speak with agents and ultimately to cooperate with the investigation. **TREIGLE** supplied agents with details of the illegal turtle smuggling scheme that corroborated and added to the information that they had learned during the investigation. **TREIGLE** confirmed J.T.'s role as his supplier of illegally captured North American Wood turtles in Pennsylvania. **TREIGLE** told agents about additional shipments that he expected to receive from J.T. Based on that information, agents intercepted a package of turtles that J.T. had shipped to **TREIGLE**, and with **TREIGLE**'s consent, opened the package, which contained North American Wood turtles. **TREIGLE** also confirmed that the shipments he had made to J.T. contained cash or cash equivalents and that the shipments he made to California contained turtles. **TREIGLE** told agents that he arranged shipments with J.T. through text messages and that he brokered the sales of turtles with buyers in Hong Kong through email.

In order to obtain further evidence of the unlawful conspiracy, investigators continued to facilitate the scheme as described above. **TREIGLE** agreed to cooperate with investigators by processing the turtle and money transactions, while law enforcement efforts were made in PA, CA, and Hong Kong, China.

TREIGLE provided information about J.T., the individual capturing the turtles from the wild in Pennsylvania. The communications between **TREIGLE** and J.T. facilitating the unlawful taking, shipment, storage, and payment for North American Wood turtles in PA were conducted through phone texts. The phone numbers associated with these texts are 985-XXX-XXXX (**TREIGLE**) and 724-XXX-XXXX (J.T.). The following paragraphs outline

communications and transactions that occurred between **TREIGLE** and J.T. after **TREIGLE** began cooperating in the investigation and document J.T.'s role as the supplier of the North American Wood turtles in the illegal scheme.

On June 27, 2014, J.T. shipped 13 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS. J.T. and **TREIGLE** communicated via phone texts, that the turtles were sent, how many were sent, and how much money J.T. was owed. J.T. gave **TREIGLE** the tracking number and **TREIGLE** affirmed that the shipment had arrived. With **TREIGLE**'s consent, agents opened the package and took photos of the turtles.

On June 30, 2014, J.T. shipped 10 North American Wood Turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS. J.T. and **TREIGLE** communicated via phone texts, that the turtles were sent, how many were sent, and how much money J.T. was owed. J.T. gave **TREIGLE** the tracking number and **TREIGLE** affirmed that the shipment had arrived. With **TREIGLE**'s consent, agents opened the package and took photos of the turtles.

On July 1, 2014, **TREIGLE** sent \$2,500 in cash to J.T. as payment for the turtles he had received. **TREIGLE** communicated via phone texts with J.T. affirming shipment was sent. J.T. relayed that he was sending an additional 3 pairs of North American Wood Turtles, and asked for \$2860 to be sent instead of \$2500. **TREIGLE** replied that shipment had already been sent and that he would pay the difference on the next cash payment. On July 3, 2014, the package was delivered to J.T. at the address listed on the package, XXX 11th Street Charleroi, PA. USPIS inspectors in PA conducted surveillance on J.T.'s residence and confirmed delivery of the cash.

On July 1, 2014, J.T. shipped 15 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS. J.T. and **TREIGLE** communicated via phone texts, that

the turtles were sent, how many were sent, and how much money J.T. was owed. J.T. gave **TREIGLE** the tracking number and **TREIGLE** affirmed that the shipment had arrived. With **TREIGLE's** consent, agents opened the package and took photos of the turtles.

On July 3, 2014, J.T. shipped 9 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS. J.T. and **TREIGLE** communicated via phone texts, that the turtles were sent, how many were sent, and how much money J.T. was owed. J.T. gave **TREIGLE** the tracking number and **TREIGLE** affirmed that the shipment had arrived. With **TREIGLE's** consent, agents opened the package and took photos of the turtles.

On July 9, 2014, **TREIGLE** sent \$1,690 in cash to J.T. as payment for the turtles he had received. **TREIGLE** communicated via phone texts with J.T. affirming shipment was sent and relaying the tracking number. J.T. texted that he was sending North American Wood turtles to **TREIGLE** and was going hunting for North American Wood turtles on July 10, 2014. On July 10, 2014, the package was delivered to J.T. at the address listed on the package, XXX 11th Street Charleroi, Pa 15022. A controlled delivery was conducted by a USPIS inspector. The inspector witnessed J.T. sign for and accept the cash.

On July 11, 2014, J.T. shipped 20 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS in two separate packages. J.T. and **TREIGLE** communicated via phone texts, that the turtles were sent, how many were sent, and how much money J.T. was owed. J.T. texted that he had only caught male North American Wood turtles on his hunting trip that had taken place on July 10, 2014, but was going to hunt for North American Wood turtles again on Saturday, July, 12th. With **TREIGLE's** consent, agents opened the package and took photos of the turtles.

On July 14, 2014, J.T. shipped 9 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS. When J.T. delivered the package to the United State Post Office in Dunlevy, Pennsylvania, USPIS inspectors conducted surveillance and took photos of J.T. arriving and leaving the Post Office in his Black GMC Yukon PA registration XXXXXXXX. Video was also taken of J.T. as he completed shipping documents and made payment to the USPS. On July 14, 2014, J.T. and **TREIGLE** communicated via phone texts, that the turtles were sent, how many were sent and how much money J.T. was owed. J.T. gave **TREIGLE** the tracking number and **TREIGLE** affirmed that the shipment had arrived. J.T. texted that he was going hunting for North American Wood turtles on July 16, 2014. He also texted that he had a large amount of Eastern Box turtles that he wanted to sell. As with North American Wood turtles, it is illegal to capture Eastern Box turtles in Pennsylvania. With **TREIGLE's** consent, agents opened the package on July 16, 2014, and took photos of the turtles.

On July 17, 2014, **TREIGLE** sent \$1,050 in cash to J.T. as payment for the turtles he had received. **TREIGLE** communicated via phone texts with J.T. affirming shipment was sent and relaying the tracking number. On July 23, 2014, investigators in PA conducted a trash pull at J.T.'s residence at approximately 04:30 hours. Two bags were removed from the trash that was placed outside the fenced yard for normal trash pickup. In the trash, investigators discovered a USPS "Flat Rate Mailing Envelope" that had been torn into several small pieces. The envelope contained the following information: "From: Treigle, XXX Stephanie Ln., Covington, LA 70435"; "TO: [J.T.], XXX 11th St, Charleroi, PA 15022." The envelope had the following postage information: "U.S. Postage Paid, Madisonville, LA 70447, Jul 17, 14, amount \$5.60" and was assigned "USPS Tracking# 9114901230803655398201," which was the tracking

number on the envelope that was used to send the payment of \$1050.00 to J.T. on July 17, 2014.

On July 22, 2014, J.T. shipped 10 North American Wood turtles from Pennsylvania to **TREIGLE** in Louisiana via the USPS in two separate packages. J.T. delivered the packages to the United State Post Office in Dunlevy, Pennsylvania. Video was taken of J.T. as he completed shipping documents and made payment to the USPS. **TREIGLE** communicated via phone texts with J.T. affirming shipment arrival. J.T. also texted that he was hunting North American Wood turtles on this same date. With **TREIGLE's** consent, agents opened the package and took photos of the turtles.

During the text message exchanges between **TREIGLE** and J.T., **TREIGLE** told J.T. that he was waiting on money to arrive from Hong Kong before **TREIGLE** could send money to J.T. for the turtles that he was capturing and sending to **TREIGLE**.

TREIGLE also provided information about the individuals to whom he was selling the turtles. **TREIGLE** told agents that he had a single buyer with whom he communicated despite shipping to three separate addresses in California. **TREIGLE** told the agents that he arranged the deals with his buyer in California through his email (golfnut106@hotmail.com) and supplied agents with the email address of his buyer, who he knew as H.M. (hy13d@hotmail.com). **TREIGLE** stated that all of the turtle transactions were facilitated by communications through the golfnut106@hotmail.com and hy13d@hotmail.com email accounts. Based on this information, the government obtained search warrants for the golfnut106@hotmail.com and hy13d@hotmail.com email accounts.² Emails from these accounts would be introduced into

² On August 5, 2014, investigators received a response from Microsoft, Inc. regarding the search warrant executed on the Hy13d@hotmail.com email address. The subscriber information for the account showed "H.M." as the creator of the account but the emails themselves indicate that H.Y.B.W. (who is the same person as H.M.) was the

evidence to demonstrate that **TREIGLE** and H.M. aka H.Y.B.W., aka B.W. knew that the turtles they were buying and selling were illegal for them to buy and sell. Transactions that occurred after **TREIGLE** began cooperating with the government are detailed in the following paragraphs. The transactions that occurred before **TREIGLE** began cooperating are substantially similar to those detailed below.

On July 8, 2014, **TREIGLE** and H.M., aka H.Y.B.W., aka B.W. negotiated a sale of North American Wood turtles via email. On July 9, 2014, **TREIGLE** received a wire for \$6000 in a government controlled account from H.M., aka H.Y.B.W., aka B.W. for payment of the North American Wood turtles. On July 14, 2014, 17 North American Wood turtles were sent to "Kary Lee" XXXX S Lois St. West Covina, CA 91792. On July 15, 2014, surveillance was conducted by investigators in California. The surveillance confirmed delivery of the turtles at the recipient address and the subsequent smuggling of the North American Wood turtles to Hong Kong by A.W. On July 18, 2014, customs agents in Hong Kong conducted a controlled delivery of the turtles and arrested H.M., aka H.Y.B.W., aka B.W. and another individual for accepting the smuggled turtles.

On the morning of July 19, 2014, **TREIGLE** received an email from H.M., aka H.Y.B.W., aka B.W. stating he was having problems with his hy13d@hotmail.com email and that he would be contacting **TREIGLE** from a new email address. Thereafter, no more emails were sent by H.M., aka H.Y.B.W., aka B.W. from the hy13d@hotmail.com email address to **TREIGLE**'s golfnut106@hotmail.com email address.

user of the email address. The returned information also indicated that user IP addresses were in Hong Kong, China. Investigators also located emails between A.W. and H.M. discussing the arrival of turtles, shipping costs, labor costs, where to send payments, and the recipients of smuggled turtles.

At agents' request, **TREIGLE** then reached out to another individual who had previously contacted him about turtles for purchase and who had mentioned H.M.'s name. Specifically, in November 2013, **TREIGLE** had received emails to his golfnut106@hotmail.com email address from DAVE, last name unknown (LNU) claiming to have gotten **TREIGLE's** golfnut106@hotmail.com email address from H.M. DAVE LNU contacted **TREIGLE** via email address Cuorafever@gmail.com. DAVE LNU wanted to begin buying North American Wood turtles from **TREIGLE** in the fall of 2013. DAVE LNU only used the first name of DAVE and no other identifiers. DAVE LNU claimed that he worked with H.M. At that point, **TREIGLE** did not deal with DAVE LNU and instead sold turtles only to H.M. via the hy13d@hotmail.com email address.

On July 21, 2014, **TREIGLE** sent an email from his golfnut106@hotmail.com email address to DAVE LNU at his Cuorafever@gmail.com email address stating that **TREIGLE** was expecting a shipment of turtles to sell and asking if everything was okay with H.M. DAVE LNU assured **TREIGLE** that H.M. was okay and that H.M. would get back with him. DAVE LNU contacted **TREIGLE** via the Cuorafever@gmail.com email address and stated that he would buy the turtles. **TREIGLE** asked if DAVE LNU needed **TREIGLE's** bank information for the wire, and DAVE LNU stated that he had all of the information and would send a wire.

Based on these initial emails, which agents viewed through **TREIGLE's** account, investigators sought and obtained a search warrant directing Google Inc. to turn over information and emails from the cuorafever@gmail.com account.³ Emails from these accounts would be

³ The subscriber information for the account showed a "Dave Vernon" as the creator of the account. It also indicated that user IP addresses were in Hong Kong, China, and the recovery email address is Johnloon@hotmail.com. Emails from the account show that the person using the account is H.K.L. (aka, J.L.). The

introduced into evidence to demonstrate that **TREIGLE** and DAVE LNU knew that the turtles they were buying and selling were illegal for them to buy and sell. The government would also show through these emails that DAVE LNU works closely with H.M., and specifically that DAVE LNU knew **TREIGLE**'s banking information, the prices H.M. was paying **TREIGLE** for the North American Wood turtles, and the recipient information where **TREIGLE** was sending wood turtles in CA.

Investigators have also confirmed that a wire payment discussed by DAVE LNU in the email communications was actually made. On July 24, 2014, a wire in the amount of \$4,2254 was sent by K.W.O., presumably at the behest of DAVE LNU, to a government-controlled account set up by agents to facilitate the investigation. The payment was for a shipment of North American Wood turtles and was intended to be sent to **TREIGLE**.

On July 24, 2014, **TREIGLE** asked DAVE LNU via email if he was interested in buying any Eastern Box turtles, which are also illegal to harvest from Pennsylvania and illegal to sell from Louisiana without a license. DAVE LNU agreed to purchase the box turtles and a price was negotiated. **TREIGLE** explained to DAVE LNU that **TREIGLE**'s friend in Pennsylvania, who catches the Eastern Box turtles, wanted to know if DAVE LNU wanted additional Box turtles after the negotiated sale, because there were plenty in the woods where he hunted them. DAVE LNU replied "Yes I can take loads. But please stay low key my friend :)." DAVE LNU requested no turtles be sent until the following Thursday, July 31, 2014.

government has confirmed that DAVE LNU and H.K.L. (aka, J.L.) are one and the same person and that H.K.L. uses the DAVE LNU name in order to disguise his identity.

⁴ Actual payment was \$4250.00, but a processing fee reduced the total to \$4225.00.

On July 28, 2014, DAVE LNU had a wire for \$3,750 sent to an account he believed to be controlled by **TREIGLE**, but that was actually controlled by Homeland Security Investigations. The sender of the wire was A.K.W. (later confirmed to be the wife of DAVE LNU, aka H.K.T., aka J.L.). The wire was payment for North American Wood turtles and Eastern Box turtles sold to DAVE LNU. The Wood turtles and Eastern Box turtles were illegally taken in Pennsylvania and sold by J.T. to **TREIGLE**. DAVE LNU requested no turtles be sent until the following Thursday, July 31, 2014.

On July 31, 2014, two shipments of North American Wood turtles were sent to A.W. at the "Kary Lee" address in California detailed above. Surveillance efforts at the recipient address confirmed delivery at the recipient address, but no smuggling activity was observed during the surveillance. DAVE LNU, aka H.K.T., aka J.L. later confirmed that this shipment of turtles had been sent to Hong Kong.

From on or about August 8, 2014, through August 14, 2014, **TREIGLE** began negotiations via email with DAVE LNU for the sale of a large number of North American Wood turtles and a smaller number of Albino Red Eared Sliders. **TREIGLE** offered the sale of up to 100 North American Wood turtles in return for a cash lump sum payment to be delivered in person. **TREIGLE** informed DAVE LNU that he knew a competitor that would buy all the North American Wood turtles he could get for \$1000 per pair and pay in cash. **TREIGLE** informed DAVE LNU that he was in Louisiana as the deal was being arranged. DAVE LNU agreed to pay \$25,000 in cash towards the deal and another \$25,000 at a later date if **TREIGLE** could produce the North American Wood turtles. At that point a back and forth dialog about scheduling the meeting began.

DAVE LNU reassured **TREIGLE** that he wanted to continue buying North American Wood turtles from him and that he could be trusted. DAVE LNU offered to send **TREIGLE** a pair of NIKE shoes as a gift to keep their business relationship going. As the email conversation progressed, **TREIGLE** asked DAVE LNU how much DAVE LNU was reselling the North American Wood turtles for in China. DAVE LNU stated that he is located in California and said that he does not sell directly to China but wholesales to an Asian customer and gets \$1200 a pair. DAVE LNU also discussed his knowledge of two enforcement operations where someone got caught sending Box turtles to China from Seattle, and where a group of Asians got caught taking turtles in and out of the United States through Canada.

During the scheduling dialog, **TREIGLE** attempted to get DAVE LNU to travel to New Orleans, LA for the meeting, but DAVE LNU would not. They eventually arranged to meet at a mall food court in Orlando, Florida. On Tuesday, August 19, 2014, **TREIGLE** met with DAVE LNU at the Mall at Millennia food court in Orlando, Florida at approximately 1 pm. Agents monitored the conversation by video and audio. After a short introduction, **TREIGLE** told DAVE LNU that he had driven in from Louisiana with North American Wood turtles that were caught from the wild in Pennsylvania. DAVE LNU said that he was there only to give **TREIGLE** \$25,000 for his friend H.M. and that the money was for Albino Red-Eared Sliders and not for North American Wood turtles. The two men then made small talk about turtles, including prices for certain kinds of turtles. DAVE LNU said that H.M. had a turtle project in California, but that DAVE LNU was mainly a pig farmer. There was then some additional small talk about turtles and then a pause while **TREIGLE** went to get some food. When **TREIGLE** returned, DAVE LNU's demeanor seemed more relaxed. **TREIGLE** inquired about delivering

the North American Wood turtles to California in large numbers and DAVE LNU said that he could only take 25 at a time. **TREIGLE** asked why he couldn't just bring them to H.M.'s turtle project. DAVE LNU said that he could not do that because they could only handle 25 because H.M. has a small office set up in California to handle turtles. DAVE LNU said H.M. has two females, one named A.,⁵ who receive the turtles that are sent and maintain the turtles at their family's residence and can only handle 25 at a time. **TREIGLE** asked if DAVE LNU meant "Kary Lee" and DAVE LNU agreed. DAVE LNU and **TREIGLE** discussed future deals and DAVE LNU said he would pay cash if that is what **TREIGLE** wants for the North American Wood turtles. DAVE LNU said that H.M. brought DAVE LNU in because DAVE LNU can produce the cash. DAVE LNU said he would come back into the United States in a month with the next \$25,000 for the next shipment. There was a conversation about trust and DAVE LNU said that he felt better and trusted **TREIGLE** after meeting with him. DAVE LNU said that he was a little nervous with **TREIGLE** bringing the North American Wood turtles because he knew that undercover agents create stings to arrest people. DAVE LNU said that all he wants to be told in deals is that the turtles are captive breed. He doesn't want to hear that they came from the wild. DAVE LNU provided **TREIGLE** with \$25,000 cash for the sale of North American Wood turtles that were captured from the wild in Pennsylvania, shipped to Louisiana, and brokered for sale from Louisiana. DAVE LNU said that he really wanted to stay low key with any future deals, and **TREIGLE** agreed and said that's why he wanted to be paid in cash and wanted to deliver the turtles instead of shipping. DAVE LNU said that he did not want to take

⁵ DAVE LNU used the first name of A.W.

the four North American Wood turtles that **TREIGLE** had brought with him and asked that **TREIGLE** mail them to the same address in California. The meeting ended around 2:50 pm.

Shortly after the meeting between **TREIGLE** and DAVE LNU ended, agents arrested DAVE LNU while he was still at the food court.

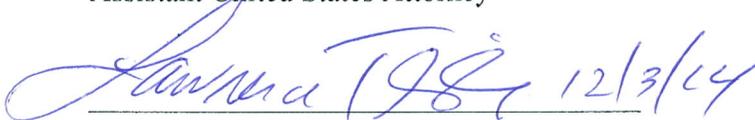
The government and **TREIGLE** stipulate and agree that **TREIGLE** received over \$200,000 but less than \$400,000 in proceeds from the illegal sale of turtles during the time span of the conspiracy charged in the Bill of Information. **TREIGLE** admits that he knew the wires he received as payment for the turtles came from Hong Kong, China. **TREIGLE** also admits that he knew the North American Wood turtles were being captured from the wild by J.T. in Pennsylvania and that it was illegal to buy, sell, trade, or deal in North American Wood turtles captured from the wild. **TREIGLE** also admits that he used falsified mailing labels in order to attempt to disguise that he was the sender of packages of turtles and failed to declare that packages of turtles that he was shipping through the USPS or FedEx in fact contained turtles.



DAVID HALLER
Assistant United States Attorney

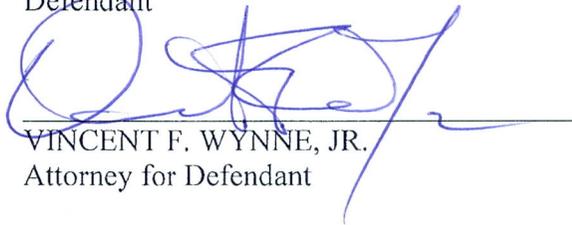
12/3/14

Date



LAWRENCE TREIGLE
Defendant

Date



VINCENT F. WYNNE, JR.
Attorney for Defendant

12/3/14
Date