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Great Falls

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ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SIMON PAUL and TRAVIS JOHN
BRANSON,

Defendants.

CR 23-55-M-DLC

INDICTMENT

CONSPIRACY (Count 1)

Title 18 U.S.C. § 371

**(Penalty: Five years of imprisonment,
\$250,000 fine, and three years of supervised
release)**

**UNLAWFUL TRAFFICKING OF BALD
AND GOLDEN EAGLES (Counts 2-14)**

Title 16 U.S.C. § 668(a)

**(Penalty for First Offense: One year of
imprisonment, \$5,000 fine, and one year of
supervised release)**

**(Penalty for Second and Subsequent
Conviction: Two years of imprisonment,
\$10,000 fine, and one year of supervised
release)**

	LACEY ACT (Count 15) Title 16 U.S.C. § 3372(a)(1) and 3373(d)(1)(B) (Penalty: Five years of imprisonment, \$20,000 fine, and three years of supervised release)
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THE GRAND JURY CHARGES:

At all times relevant to this indictment:

1. The Bald and Golden Eagle Protection Act was enacted in 1940 to protect the bald eagle, recognizing that the bald eagle is not merely a bird of biological interest, but this country's national symbol, which reflects America's ideals of freedom. In 1962, Congress extended the Act to also protect golden eagles.
2. During the investigation law enforcement uncovered messages from BRANSON and others describing the illegal taking of eagles by stating, "[O]ut [here] committing felonies," and telling buyers he was "on a killing spree" to obtain eagle tail feathers for future sales.
3. PAUL, BRANSON, and others, hunted and killed eagles on the Flathead Indian Reservation and elsewhere. In total, the defendants killed approximately 3,600 birds, including eagles. The defendants then illegally sold the eagles on the black market for significant sums of cash across the United States and elsewhere.

COUNT 1

Between, on, or about January 2015, until on or about March 2021, near Ronan, in Lake County, in the State and District of Montana, within the exterior boundaries of the Flathead Indian Reservation, and elsewhere, the defendants, SIMON PAUL and TRAVIS JOHN BRANSON, knowingly and willfully conspired and agreed with each other, and with persons both known and unknown to the Grand Jury, to commit any offense against the United States, that is, to illegally kill, transport, offer for sale, and sell bald and golden eagles, in violation of 16 U.S.C. §§ 668(a) and 3372(a)(1) and 3373(d)(1)(B).

In furtherance of the conspiracy, the defendants committed the following overt acts:

OVERT ACTS

1. From January 2019 until March 2021, TRAVIS JOHN BRANSON travelled from Washington to the Flathead Indian Reservation to shoot bald and golden eagles.

2. From January 2019 until March 2021, SIMON PAUL lived near Ronan on the Flathead Indian Reservation, and he was a “shooter” and “shipper” of bald and golden eagles for TRAVIS JOHN BRANSON. When BRANSON arrived on the Flathead Indian Reservation, PAUL would meet and help kill, transport, and ship bald and golden eagles for future sales on the black market.

3. On December 17, 2020, TRAVIS JOHN BRANSON sent a text message to a purchaser with a photo of a golden eagle tail set. On the same date, BRANSON received a PayPal purchase for the golden eagle tail set.

4. Two days later, on December 19, 2020, SIMON PAUL mailed from St. Ignatius to Texas the golden eagle tail feather set.

5. On December 21, 2020, BRANSON received a message from a purchaser that said, "Got that thang from Simon. And the mirror feathers. Tnks."

6. On March 13, 2021, TRAVIS JOHN BRANSON and SIMON PAUL returned to a previously killed deer to lure in eagles.

7. On March 13, 2021, TRAVIS JOHN BRANSON shot and killed a golden eagle.

8. On March 13, 2021, SIMON PAUL cleaned the golden eagle.

9. On March 13, 2021, TRAVIS JOHN BRANSON and SIMON PAUL placed various golden eagle parts in the vehicle for transport.

COUNTS 2-9

Between, on, or about January 2019, until on or about March 2021, near Ronan, in Lake County, in the State and District of Montana, within the exterior boundaries of the Flathead Indian Reservation, and elsewhere, the defendant, TRAVIS JOHN BRANSON, without being permitted to do so, knowingly, and with wanton disregard for the consequences of his actions, took, possessed, sold,

bartered, offered to sell, transported, and exported, golden and bald eagles, including any part, as outlined in the chart below, in violation of 16 U.S.C. § 668(a).

Count	Date	Item
2	April 30, 2020	Bald Eagle Wings
3	May 17, 2020	Golden Eagle Wing
4	November 7, 2020	Golden Eagle Spinner Set
5	December 17, 2020	Golden Eagle Tail
6	December 31, 2020	Golden Eagle Wings
7	January 7, 2021	Golden Eagle Tails
8	March 1, 2021	Golden Eagle Tails
9	March 13, 2021	Golden Eagle

COUNTS 10-14

Between, on, or about January 2019, until on or about March 2021, near Ronan, in Lake County, in the State and District of Montana, within the exterior boundaries of the Flathead Indian Reservation, and elsewhere, the defendant, SIMON PAUL, without being permitted to do so, knowingly, and with wanton disregard for the consequences of his actions, took, possessed, sold, bartered,

offered to sell, transported, and exported, golden and bald eagles, including any part, as outlined in the chart below, in violation of 16 U.S.C. § 668(a).

Count	Date	Item
10	December 17, 2020	Golden Eagle Tail
11	December 20, 2020	Golden Eagle
12	February 3, 2021	Golden Eagle
13	February 28, 2021	Bald Eagle
14	March 13, 2021	Golden Eagle

COUNT 15

Between, on, or about January 2019, until on or about March 2021, near Ronan, in Lake County, in the State and District of Montana, within the exterior boundaries of the Flathead Indian Reservation, and elsewhere, the defendants, SIMON PAUL and TRAVIS JOHN BRANSON, knowingly engaged in conduct that involved the sale and purchase of, the offer of sale and purchase of, and the intent to sell and purchase, wildlife with a market value in excess of \$350, knowing that the wildlife was taken, possessed, transported, and sold in violation of any underlying law in that the defendants, SIMON PAUL and TRAVIS JOHN BRANSON, knowingly imported, exported, transported, sold, received, and acquired wildlife, that is bald and golden eagles, including any part, in a manner unlawful under the laws of the United States, including the Bald and Golden Eagle

Protection Act, 16 U.S.C. § 668(a), all in violation of 16 U.S.C. §§ 3372(a)(1) and 3373(d)(1)(B).

Foreperson signature redacted. Original document filed under seal.

A TRUE BILL.

FOREPERSON _____

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