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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 06 2015

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 DELBERT LOREN WHEELER,)

13 Defendant.)

4:14-CR-06042-SAB

INFORMATION SUPERSEDING
INDICTMENT

Vio: 16 U.S.C. § 668dd(c), (f)
Disturbing Natural Growth on
Lands within the National
Wildlife Refuge System
(Count 1)

50 CFR § 27.31 and 16 U.S.C.
§ 668dd(f) Use of Motor
Vehicle on Non-Designated
Routes within the National
Wildlife Refuge System
(Count 2)

22 The Grand Jury Charges:

COUNT 1

23
24 On or about October 7, 2011, in the Eastern District of Washington, DELBERT
25 LOREN WHEELER, without permission under law to do so, did knowingly disturb
26 and injure natural growth on lands within the National Wildlife Refuge System, to
27
28

1 wit: the Fitzner/Eberhardt Arid Lands Ecological Reserve, in violation of 16 U.S.C.
2 § 668dd(c), (f) and 18 U.S.C. § 2.

3
4 COUNT 2

5 On or about October 7, 2011, in the Eastern District of Washington, DELBERT
6 LOREN WHEELER, without permission under law to do so, did knowingly use a
7 motorized vehicle on lands not on designated routes of travel within the National
8 Wildlife Refuge System, to wit: Fitzner/Eberhardt Arid Lands Ecological Reserve, in
9 violation of 50 CFR § 27.31 and 16 U.S.C. § 668dd(f).
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11 DATED this 6th day of January 2015.
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14 Michael C. Ormsby
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