

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ROBERT B. KNOWLTON,

Defendant.

INDICTMENT

Title 16, United States Code, Section 470ee (b) (2)

Title 18, United States Code, Section 2314

Title 18, United States Code, Section 2

The Grand Jury charges:

COUNT ONE

On or about July 17, 2008, in the State and District of Colorado, ROBERT B. KNOWLTON, the defendant herein, did knowingly sell and offer to sell an archaeological resource, to wit: a cloud blower pipe, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500.

All in violation of Title 16, United States Code, Section 470ee (b) (2).

COUNT TWO

On or about July 17, 2008, in the State and District of Colorado, ROBERT B. KNOWLTON, the defendant herein, did knowingly sell and offer to sell an archaeological resource, to wit: a Midland point, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500.

All in violation of Title 16, United States Code, Section 470ee (b) (2).

COUNT THREE

On or about July 17, 2008, in the State and District of Colorado, ROBERT B. KNOWLTON, the defendant herein, did knowingly sell and offer to sell an archaeological resource, to wit: a Hell Gap knife, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500.

All in violation of Title 16, United States Code, Section 470ee (b) (2).

COUNT FOUR

On or about July 18, 2008, in the State and District of Colorado, ROBERT B. KNOWLTON, the defendant herein, did knowingly transport and cause to be transported from Colorado to Utah archaeological resources, to wit:

1. A Cloud Blower pipe, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500,

2. A Midland Point , which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500, and

3. A Hell Gap knife, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500.

All in violation of Title 16, United States Code, Section 470ee (b)(2) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about July 18, 2008, in the State and District of Colorado, ROBERT B. KNOWLTON, the defendant herein, did transport, transmit, and transfer and did cause to be transported, transmitted and transferred from Colorado to Utah in interstate commerce goods, wares, and merchandise to wit:

1. A Cloud Blower pipe, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500, and was sold for \$750.

2. A Midland Point , which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500, and was sold for \$3,000.

3. A Hell Gap knife, which was removed from public lands in violation of Federal law, which resource was valued in excess of \$500, and was sold for \$3,000.

with a value of \$5,000 or more knowing the same to have been stolen, converted, or taken by fraud.

All in violation of Title 18, United States Code, Section 2314 and 2.

A TRUE BILL

Ink signature on file in the clerk's office
FOREPERSON

DAVID M. GAOUCETTE
United States Attorney

By: s/Robert E. Mydans
Robert E. Mydans
Assistant United States Attorneys
1225 Seventeenth Street, Suite 700
Denver, Colorado 80202
(303) 454-0234 (303) 454-0402 (fx)
bob.mydans@usdoj.gov

(Rev. 04/07)

DATE:8/25/09

DEFENDANT: ROBERT B. KNOWLTON

YOB: 1943

ADDRESS (CITY/STATE): Grand Junction, CO

COMPLAINT FILED? _____ YES X NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? _____ YES X NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSE: Counts 1-4: 16 U.S.C. §470ee (b) (2)
Sale of, offer to sell, and transport of an archaeological resource
Count 5: 18 U.S.C. §2314
Interstate transportation of stolen property

LOCATION OF OFFENSE (COUNTY/STATE): Larimer County, Colorado

PENALTY: Counts 1-4: NMT 2 years of imprisonment, a fine of NMT \$20,000
or both fine and imprisonment; NMT 1 year supervised release;
restitution; \$100 special assessment fee.
Count 5: NMT 10 years of imprisonment, a fine of NMT than
\$250,000 or both fine and imprisonment, NMT 3 years supervised
release, restitution: \$100 special assessment fee.

AGENT: SA David K. Moore
Bureau of Land Management

AUTHORIZED BY: Robert E. Mydans
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

X five days or less _____ over five days _____ other

THE GOVERNMENT

_____ will seek detention in this case x will **not** seek detention in this case

The statutory presumption of detention **is** or **is not** applicable to this defendant. **(Circle one)**

OCDETF CASE: _____ Yes x No