

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

No. 26-cr-75- JL- AJ-01-03

(1) SHERWOOD G. DUBREY, JR.,
(2) RANDY A. INMAN, and
(3) SHERWOOD G. DUBREY, SR.

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

1. The bobcat (*Lynx rufus*) was a wild cat native to North America.

2. In New Hampshire, it was unlawful to take animals except as authorized by law. N.H. Rev. Stat. § 207:2. In New Hampshire “[t]here shall be no open season for the taking of bobcat.” N.H. Code Admin. R. Fis 303.05.

3. New York had a bobcat hunting season from October 25 to February 15 each year. 6 NY Admin. Code 2.20. New York required all bobcats taken during the hunting season to be sealed within ten days of the close of the season and before being exported out of state. 6 NY Admin. Code 6.3(c)(4)(i)-(ii).

4. The Lacey Act provided, “[i]t is unlawful for any person to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any fish or wildlife taken, possessed, transported, or sold in violation of any law or regulation of any state....” 16 U.S.C. § 3372(a)(2)(A).

5. The Lacey Act defined “taken” to mean “captured, killed or collected....” 16 U.S.C. § 3371(k)(1).

6. The false labeling provision of the Lacey Act provided, in pertinent part, that it is “... unlawful for any person to make or submit any false record, account, or label for, or any false identification of, any fish, wildlife, or plant which has been, or is intended to be... transported in interstate or foreign commerce.” 16 U.S.C. § 3372(d)(2).

7. The United States and 184 other countries were signatories to a multilateral treaty called the Convention on International Trade in Endangered Species of Wild Fauna and Flora, 27 U.S.T. 1087, T.I.A.S. 8249 (“CITES”). CITES provided a mechanism for regulating international trade in species whose survival is considered threatened by trade. By agreement of the signatories, such species were placed on one of three appendices, depending on the level of protection needed for the species. International trade in species listed on these appendices was monitored and regulated by permits and quotas. The permit restrictions applied to live and dead specimens.

8. Wildlife listed in Appendix II of CITES were those species that were not necessarily threatened with extinction, but which may have been threatened with extinction unless trade was strictly regulated to prevent utilization incompatible a specific species’ survival. CITES allowed international commercial trade in Appendix II species, but only after a valid permit/certificate was issued by the exporting country.

9. Bobcats were listed in CITES Appendix II on April 2, 1977, meaning an export permit was required for international trade in bobcats or bobcat parts. New Hampshire did not have an export program for bobcats and did not distribute CITES tags for bobcats. New York had an export program for bobcats and provided successful trappers or hunters of bobcats CITES tags with serial numbers bearing the prefix “NYB.”

DEFENDANTS

10. Sherwood “Woody” Dubrey, Jr. (DUBREY, JR.) was a New Hampshire resident who hunted and trapped bobcats in New Hampshire. He held a New Hampshire Trapping License and New Hampshire Wildlife Control Operator License. DUBREY, JR. did not hold a New York hunting or trapping license during the times relevant to this Information.

11. Randy Inman (INMAN) was a New Hampshire resident who hunted and trapped bobcats in New Hampshire. He held a New Hampshire Trapping License and New Hampshire Wildlife Control Operator License. INMAN did not hold a New York hunting or trapping license during the times relevant to this Information.

12. Sherwood “Woody” Dubrey, Sr. (DUBREY, SR.) was a New York resident who hunted and trapped bobcats. He would use New York bobcat tags to tag bobcats killed in New Hampshire by DUBREY, JR. and INMAN. DUBREY, SR. also delivered the tagged bobcat pelts to a fur transporter for delivery in interstate commerce to Wisconsin.

COUNT ONE

(Conspiracy, 18 U.S.C. § 371; 16 U.S.C. §§ 3372, 3373)

13. The United States Attorney re-alleges paragraphs 1 through 12.

14. From in or about November 2018 through in or about December 2022, in the District of New Hampshire and elsewhere, defendants:

**SHERWOOD DUBREY, JR.
and
RANDY INMAN**

knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the United States Attorney, to commit the following offenses:

- a. to knowingly engage in conduct involving the sale of, offer to sell, and intent to sell wildlife, that is, bobcats, and did knowingly transport, receive, and acquire in interstate

commerce said wildlife, with a market value greater than \$350, knowing that the wildlife had been taken, possessed, and transported in violation of the laws and regulations of the state of New Hampshire, contrary to Title 16, United States Code, Sections 3372(a)(2)(A) and 3373(d)(1)(B);

- b. to knowingly make and submit false records, accounts, and labels for, wildlife, that is, bobcats, and said wildlife was, and was intended to be, transported in interstate commerce, and the offense involved the sale, offer of sale, and the commission of an act with intent to sell wildlife with a market value greater than \$350, contrary to Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(A)(ii).

Manner and Means of Conspiracy

15. To accomplish the criminal offenses that were the objects of the conspiracy and enrich themselves, DUBREY JR. and INMAN killed bobcats in violation of New Hampshire law and had them illegally tagged in New York, falsely claiming the animals had been taken in that state. This made the bobcats appear to have been legally taken when they had not been. Having concealed the illegal taking of the bobcats from state and federal authorities, DUBREY JR. and INMAN caused the bobcat skins to be transported through other states for the purpose of exporting the fur to an auction in Canada.

16. DUBREY JR. and INMAN through trapping and shooting would take bobcats in New Hampshire in violation of state law when there was no lawful hunting season for the cats. They sometimes used rifles with scopes that could capture videos and photographs of the kills. These videos and photographs could be transferred to cell phones. DUBREY, JR. and INMAN would disseminate and share videos and photographs of some bobcat hunts via text messages.

Overt Acts

17. To effectuate the objects of the conspiracy, the co-conspirators, on or about the dates listed below, committed the following overt acts in furtherance thereof:

2018 through 2019 Hunting and Trapping Season

Overt Act 1. On November 8, 2018, DUBREY, JR. and DUBREY, SR. discussed “Randy” going to collect a trapped bobcat from a property in New Hampshire. Later that day, INMAN messaged DUBREY, JR. and asked, “Want that cat[?]”

Overt Act 2. On December 26, 2018, DUBREY, JR. messaged INMAN, asking him to travel to New York to deliver fur to DUBREY, SR.

Overt Act 3. On January 5, 2019, DUBREY, JR. and INMAN traveled to New York and delivered fur, including one bobcat, to DUBREY, SR. for tagging.

Overt Act 4. On January 8, 2019, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tag NYB1011176 for a bobcat that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 5. In or about January and February 2019, DUBREY, SR. gave the sealed bobcat skin bearing tag NYB1011176 to the agent of a fur auction for transportation to Wisconsin.

Overt Act 6. In March 2019, the bobcat bearing seal NYB1011176 was sold at auction, and the proceeds were credited to DUBREY, JR.’s seller account.

2019 through 2020 Hunting and Trapping Season

Overt Act 7. In September and October 2019, DUBREY, JR. and INMAN discussed their joint preparations for the 2019 through 2020, trapping season.

Overt Act 8. On November 15, 2019, INMAN messaged DUBREY, JR. asking what he should “do” with a bobcat caught in a trap in New Hampshire. DUBREY, JR. responded that INMAN should “shoot it” or “choke it out.” INMAN replied that it was “done.”

Overt Act 9. On November 22, 2019, INMAN killed a bobcat and messaged DUBREY, JR to inform him.

Overt Act 10. On November 26, 2019, DUBREY, JR. sent INMAN and DUBREY, SR. separate text messages with a picture of a dead bobcat at a location in New Hampshire.

Overt Act 11. On November 28, 2019, INMAN sent a message to DUBREY, JR. that included a picture of a bobcat caught in a trap. DUBREY, JR. responded and asked if INMAN had collected the animal. INMAN replied that he had.

Overt Act 12. On December 15, 2019, DUBREY, JR. messaged DUBREY, SR. to tell him that INMAN had shot a bobcat in New Hampshire.

Overt Act 13. On December 29, 2019, DUBREY, JR. and DUBREY, SR. messaged about the possibility that New Hampshire would legalize bobcats hunting. One of DUBREY, JR.’s messages stated that he did not want a legal bobcat hunting season in New Hampshire because that would create “competition.”

Overt Act 14. On January 8, 2020, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tags NYB101011 – 1012020 and NYB1012192 - 1012196 for bobcats that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 15. On January 8, 2020, DUBREY, SR. messaged DUBREY, JR. to inform him that DUBREY, SR. had tagged the bobcats in New York.

Overt Act 16. On a date in late-January or early-February 2020, DUBREY, SR. gave the tagged bobcat skins to the agent of a fur auction for transportation to Wisconsin.

Overt Act 17. On February 1, 2020, DUBREY, JR. messaged DUBREY, SR. to tell him that INMAN had taken bobcat “number 21” for the season.

Overt Act 18. On February 4, 2020, DUBREY, SR. picked up four bobcat furs from DUBREY, JR.’s New Hampshire home and transported them to New York.

Overt Act 19. On February 17, 2020, DUBREY, JR. messaged DUBREY, SR. about a bobcat killed in New Hampshire and DUBREY, SR. replied, “Nice cat but that’s closed over here now.”

Overt Act 20. On February 27, 2020, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tags NYB1012128 and NYB1012137 - 1012140 for bobcats that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 21. In August 2020, bobcats with tags NYB1012138 – 1012139 were sold at auction, and the proceeds were credited to DUBREY, JR.’s seller account.

2020 though 2021 Hunting and Trapping Season

Overt Act 22. In September and October 2020, DUBREY, JR. and INMAN discussed their joint preparations for the 2020 through 2021 trapping season.

Overt Act 23. On December 21, 2020, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tags NYB101197 – 101199 and NYB1013308 for bobcats that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 24. On December 23, 2020, DUBREY, JR. and INMAN messaged each other to arrange collection of a bobcat killed by INMAN's friend.

Overt Act 25. On January 5, 2021, DUBREY, SR. gave tagged bobcat skins to the agent of a fur auction for transportation to Wisconsin.

Overt Act 26. On January 10, 2021, DUBREY, JR. messaged INMAN and included a video that showed the shooting of a bobcat behind DUBREY, JR.'s house.

Overt Act 27. On January 13, 2021, DUBREY, JR. messaged INMAN and included videos that showed the shooting of two bobcats behind DUBREY, JR.'s house.

Overt Act 28. On January 17, 2021, DUBREY, JR. messaged INMAN and included a photograph of a dead bobcat that was taken behind DUBREY, JR.'s home.

Overt Act 29. On February 23, 2021, DUBREY, JR. messaged INMAN and included three videos that showed the shooting of a bobcat.

Overt Act 30. In April 2021, bobcats from the 2019 – 2020 trapping season with tags NYB1012011 – 1012020, NYB1012137 – 1012138, and NYB1012190 - 1012196 were sold at auction for more than \$350, and the proceeds were credited to DUBREY, JR.'s seller account.

Overt Act 31. In July 2021, bobcats with tags NYB101197, NYB101199, and NYB1013308 were sold at auction, and the proceeds were credited to DUBREY, JR.'s seller account.

2021 through 2022 Hunting and Trapping Season

Overt Act 32. In October and September 2021, DUBREY, JR. and INMAN discussed their joint preparations for the 2021 through 2022 trapping season.

Overt Act 33. On November 10, 2021, DUBREY, JR. messaged INMAN and included a photograph that showed a bobcat caught in a trap.

Overt Act 34. On December 11, 2021, DUBREY, JR. messaged INMAN and included a photograph that showed a bobcat caught in a trap.

Overt Act 35. On December 22, 2021, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tags NYB1010651 – 1010654, NYB1010790, and NYB1011786 - 1011789 for bobcats that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 36. On December 25, 2021, INMAN messaged DUBREY, JR. and included a video that showed the shooting of a bobcat.

Overt Act 37. On December 27, 2021, DUBREY, JR. messaged INMAN and included a photograph of a bobcat that DUBREY, JR. killed behind his house.

Overt Act 38. On December 31, 2021, INMAN messaged DUBREY, JR., “I never got my trapping license.”

Overt Act 39. January 6, 2022, DUBREY, SR. completed a New York Furbearer Possession Tag and obtained New York CITES tags NYB1010658 and NYB1012141 – 1012144 for bobcats that had been taken in New Hampshire by DUBREY, JR. and INMAN.

Overt Act 40. On a date in late-January or early-February 2022, DUBREY, SR. gave tagged bobcat skins to the agent of a fur auction for transportation to Wisconsin.

Overt Act 41. In March 2022, bobcats bearing NYB1010651 – 1010654, NYB1012141 – 1012144, and NYB1011786 - 1011790 were sold at auction for more than \$350, and the proceeds were credited to DUBREY, JR.’s seller account.

Overt Act 42. On December 29, 2022, DUBREY, JR and DUBREY, SR. discussed “Randy” killing a bobcat in New Hampshire.

All in violation of 18 U.S.C. § 371, 16 U.S.C. §§ 3372(a)(2)(A), (d)(2), and 16 U.S.C. §§ 3373(d)(1)(B), (d)(3)(A)(ii).

COUNT TWO

(LACEY ACT TRAFFICKING, 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2); 18 U.S.C. § 2(a))

18. The United States Attorney re-alleges paragraphs: 1 through 9, 12, and 17.

19. On or about January 6, 2022, within the District of New Hampshire and elsewhere, the defendant:

SHERWOOD DUBREY, SR.

knowingly engaged in conduct involving the receipt in interstate commerce of wildlife, that is fourteen bobcats, and in the exercise of due care he should have known that said wildlife had been taken in violation of, and in a manner unlawful under, New Hampshire law, specifically New Hampshire Revised Statutes § 207:2 and New Hampshire Code of Administrative Rules, Fisheries 303.05.

All in violation of 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(2) and 18 U.S.C. § 2(a).

Date: September 22, 2026

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