

SPECIAL REPORT: THE CRITICAL ROLE OF WHISTLEBLOWERS IN ENFORCING WILDLIFE PROTECTION LAWS

*Whistleblower Contributions to Enforcing Wildlife
Protection Laws and the Urgent Need to Enact H.R.864.*

September 14, 2019



[Whistleblowers] account for a large part of the success of an effective wildlife law enforcement program and we should take the opportunities we can as an agency to reward these people.

- Report filed by U.S. Fish and Wildlife Service
Law Enforcement Agents¹



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Introduction

The National Whistleblower Center carefully examined all existing U.S. laws pertaining to wildlife whistleblowers and evaluated the success of these programs. The National Whistleblower Center also reached out to the Government Accountability Office (GAO) to encourage an independent investigation of wildlife whistleblower reward programs. GAO issued its report on April 23rd, 2018, recommending reforms, which the responsible agencies are addressing.

Using Freedom of Information Act (FOIA) requests, we learned that three departments - the Departments of Agriculture, Commerce, and Treasury – were neglecting their wildlife whistleblower rewards authorities. We were able to ascertain only two rewards granted by NOAA (within the Commerce Department). In contrast, the Department of Interior's Fish and Wildlife Service (FWS) demonstrated that it operated a modest whistleblower program through the study period (2003-2016).

This report is based on the FWS whistleblower files, the GAO report and the NWC's independent investigation.

The main findings are:

- (1) Whistleblowers have played a critical role in wildlife law enforcement cases, but the current programs need updating to address the growing threat of international wildlife trafficking.**
- (2) The Wildlife Conservation & Anti-Trafficking Act (H.R.864) offers an enduring solution to challenges with whistleblower programs. It includes:**
 - a. Mandatory rewards with minimum payments tied to the whistleblower's role in the prosecution
 - b. Transnational application
 - c. Larger financial penalties to increase deterrence and ensure adequate funds for whistleblower rewards
 - d. Restitution
 - e. Agency-specific strategies for effectively deploying whistleblowers

PART I

The Critical Role Whistleblowers Play in Detecting Wildlife Crimes



Whistleblowers are instrumental in providing high quality information to law enforcement agents.

Fish and Wildlife Service Agents Confirm Whistleblowers are Critical Source of Information

“The case would not have been possible had [redacted] not first made law enforcement aware of the crime and second, worked with law enforcement.”²

— FWS Case "Sheldrake Game Ranch Leopards," p. 0542

“Without [the whistleblower’s] candor in coming forward with this information, his willingness to aid Service agents by contacting former employees, and to provide testimony in federal court, this case would have never reached fruition.”

— FWS Case "Lochridge Ranch," p. 0104

“The area where [the crime occurred] was very remote and contained more than one thousand (1000) acres of land... Using the specific information [the whistleblower] provided, [agents] were able to investigate [the crimes].”

— FWS Case "Horse Bait Wolf," p.0413

Fish and Wildlife Service Agents State Whistleblower Information is High Quality

“The whistleblower’s “assistance was of such significance that it is highly unlikely this case would have been successful without [it].”

— FWS Prosecution [Redacted], p. 0423

“The evidence, information, and personal contact with [the defendant] provided by [the whistleblower] in only seven months – might well have taken the service years, if ever, to obtain at the same level of quality.”

— FWS Case "Iowa Army Ammo Plant, "p. 0021

“If [redacted] had not come forward, the investigation would not have resulted in the successful prosecution of the three defendants because critical evidence had been destroyed or covered up.”

— FWS Prosecution [Redacted], p. 0131

Whistleblowers save the government countless dollars.

Whistleblowers alert the government to fraud that would otherwise go undetected. As such, incentivizing whistleblowers is a powerful tool to recover tax dollars.

Other laws with whistleblower reward provisions, such as the False Claims Act (FCA), have led to the recovery of billions of dollars in federal funds. In 2017 alone, whistleblowers helped recover \$3.4 billion under the FCA.³

Fish and Wildlife Service Agents Confirm Whistleblowers Save the Government Money

“[W]ithout the assistance of [the whistleblower], it could have easily taken an additional two years to infiltrate the illegal industry, if we were able to do it at all. A conservative estimate of the cost that would have been incurred without the assistance of [the whistleblower] would be in excess of \$90,000.”

— FWS Case "Operation Board," p. 0345

The whistleblower “provided crucial information resulting in saving the U.S. Fish and Wildlife Service thousands of dollars and investigator hours.”

— FWS Case "Asian Elephant Tusk and QT Aquarium," p. 0630

“Without [the whistleblower’s] assistance, the Service would have... requir[ed] additional agents, investigative hours and equipment at significant cost.”

— FWS Case "Iowa Army Ammo Plant," p. 0021

Rewards are critical to incentivize whistleblowers.

Monetary rewards incentivize whistleblowers to come forward with information. This not only compensates the individual for their assistance but rewards the individual for the quality of the information given to law enforcement, and recognizes the risks faced by those choosing to bravely blow the whistle.



An award to [the] witness . . . encourage[s] those with information about unlawful conduct to come forward and disclose that information to authorities—information otherwise difficult, if not virtually impossible, to obtain.⁴

- U.S. Attorney Brian Albritton
U.S. v. STX Pan Ocean Co., Ltd.



Fish and Wildlife Service Agents Recognize Awards are Critical to Incentivize Whistleblowers

“In order to complete the mission and purpose of the USFWS, Office of Law Enforcement, it is extremely important and critical to provide a monetary award to the individuals who come forward and provide information to investigators.”

— FWS Prosecution [Redacted], p. 0132

“Rewards expand the informant reporting network critical to law enforcement success.”

— FWS Prosecution [Redacted], p. 0199

The whistleblower “said he heard the radio announcement and the reward being offered... [and] decided to call the Idaho Department of Fish and Game [IDFG]... [he] decided the monetary reward was worth the risk.”

— FWS Prosecution [Redacted], p. 0064

Whistleblowers take enormous risks and contend with adverse consequences for assisting the government.

Whistleblowers are frequently victims of retaliation from their employers or other parties when they decide to come forward with information.

This stresses the importance of a monetary reward for whistleblowers. They might be risking their career or even personal security when they decide to blow the whistle.



Not only is honest behavior not rewarded by the market, but it is penalized . . . Given these costs, however, the surprising part is not that most [...] do not talk; it is that some talk at all.⁵

- Dyck, et al., Booth School of Business



Fish and Wildlife Service Agents State That Whistleblowers Take Risks and Need Our Support

“The whistleblower “began receiving threats, harassment and property damage... One of the defendants blamed him for the entire investigation and indicated that the whistleblower ‘would pay.’”

— FWS Case "Operation Board," p. 0346

“The risk included, but was not limited to, being banished by his peers... and also being known as a rat (informant) in the community.”

— FWS Prosecution [Redacted], p 0065

The whistleblower “voluntarily came forward and provided critical information regarding [redacted] smuggling activity at the expense of losing her job and financial hardship.”

— FWS Case "Oak Creek Elk Ranch," p. 0188



“In January 2005, the informant was physically assaulted as he entered his residence. The informant suffered minor lacerations and was bruised all over his head and body.”

— FWS Case "Operation Angelfish," p. 0203



Wildlife whistleblowers and law enforcement work hand-in-hand with non-profit organizations.

Non-profit and other civil society organizations can serve as an important conduit as well as a source of assistance and expertise for both law enforcement and those with information on illegal wildlife trafficking. The collaboration between all stakeholders in the fight against this destructive practice is crucial to stopping the extinction crisis.

Fish and Wildlife Service Agents Confirm Non-Profit Organizations Can Serve an Important Role

“Confirmation of the missing whooping crane was only received after FWS Special Agent [redacted], acting upon the information received from [the whistleblower], contacted a volunteer from the International Crane Foundation (ICF).”

— FWS Case "Knox County Whooping Crane," p. 0575

“A portion of the fine (\$10,000) shall be paid to the Bear Education and Restoration Group.”

— FWS Prosecution [Redacted], p. 0270

“The above requested amounts are going to be matched with the same amount from the non-government organization the ‘Defenders of Wildlife.’”

— FWS Prosecution [Redacted], p. 0061

PART II

The Wildlife Conservation and Anti-Trafficking Act Will Create an Essential Solution



The wildlife whistleblower reward program demonstrates enormous potential to enhance the effectiveness of law enforcement.

The audit of the wildlife whistleblower reward programs, based both on the FOIA documents and the GAO report, demonstrate that the current wildlife whistleblower laws are insufficient and are not fully functional.

The Fish and Wildlife Service (FWS) documents demonstrate the importance of rewarding whistleblowers, but also demonstrate the deficiencies in current laws that undermine the potential contributions whistleblowers bring to wildlife law enforcement.

Whistleblower rewards have the potential to incentivize those with information to come forward, and in doing so, assist law enforcement with the difficult role of enforcing the laws against illegal wildlife trafficking and destruction.

In just the limited number of cases provided by the FWS, successful prosecutions made possible by whistleblowers resulted in:

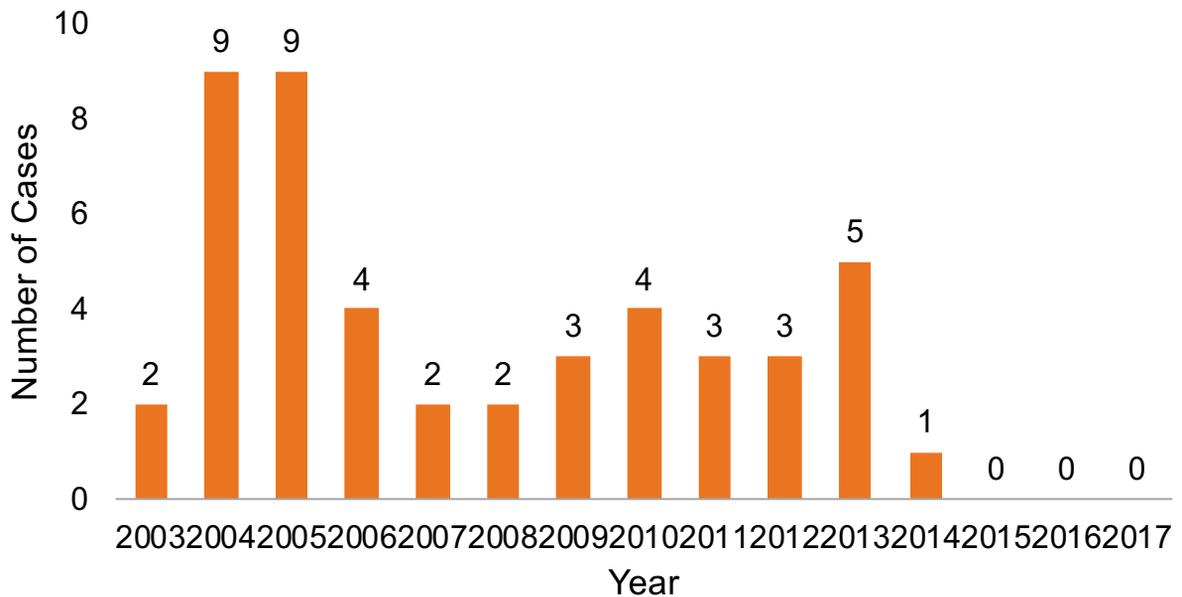
- **\$2,946,655 Total Fines**
- **\$1,484,638 Total Restitution**
- **207 Individuals Held Accountable**

The FOIA documents are a window to how effective a well-managed whistleblower program could be.

As the FWS shifts its focus from the U.S. to international wildlife trafficking, the new provisions under the Wildlife Conservation and Anti-Trafficking Act (H.R.864) will be essential for ensuring the success of future prosecutions.

fig. 1

Number of U.S. Fish and Wildlife Service whistleblower cases produced under FOIA or identified in the GAO report (FY 2003– 2017)⁶



This chart looking at the number of Fish and Wildlife Service whistleblower cases over a 15-year period demonstrates the need for legislative reform.

116TH CONGRESS
1ST SESSION

H. R. 864

To support wildlife conservation, improve anti-trafficking enforcement, provide dedicated funding at no expense to taxpayers, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

JANUARY 30, 2019

Mr. GARAMENDI (for himself and Mr. YOUNG) introduced the following bill; which was referred to the Committee on Natural Resources, and in addition to the Committee on the Judiciary, for a period to be subsequently determined by the Speaker, in each case for consideration of such provisions as fall within the jurisdiction of the committee concerned

A BILL

To support wildlife conservation, improve anti-trafficking enforcement, provide dedicated funding at no expense to taxpayers, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE; TABLE OF CONTENTS.**

4 (a) SHORT TITLE.—This Act may be cited as the
5 “Wildlife Conservation and Anti-Trafficking Act of 2019”.

6 (b) TABLE OF CONTENTS.—The table of contents for
7 this Act is the following:

Sec. 1. Short title; table of contents.
Sec. 2. Purposes.

The Wildlife Conservation and Anti-Trafficking Act (H.R.864) addresses all of the major concerns in enforcing wildlife law.

On January 30, 2019 the Wildlife Conservation & Anti-Trafficking Act (H.R.864) was introduced by Reps. Garamendi (D-CA) and Young (R-AK). H.R.864 addresses all of the major concerns with fighting large-scale wildlife crime using existing whistleblower tools.

It is modeled on the highly successful False Claims Act, Tax, Commodity, Securities, Auto-Safety, and Foreign Corrupt Practices Act whistleblower laws, while also addressing some of the specific issues necessary to successfully fight international wildlife trafficking.

H.R.864 draws from the features of the most successful programs like:

- **Mandatory rewards** with minimum payments tied to the whistleblower's role in the prosecution
- **Transnational application**
- **Larger financial penalties** to increase deterrence and ensure adequate funds for whistleblower rewards
- **Restitution**
- **Agency-specific strategies for effectively deploying whistleblowers**

The Act:

- 1 Mandates rewards to anyone who provides original information on wildlife crime that leads to a successful prosecution, regardless of U.S. citizenship or “insider” status within a company
- 2 Expands U.S. law enforcement capacity abroad to stop wildlife trafficking at the source
- 3 Mandates that wildlife trafficking becomes an offense under the federal racketeering and organized crime statutes, allowing for much larger financial penalties, greater deterrence, and greater whistleblower rewards
- 4 Mandates that monies recovered from successful prosecutions be put directly into conservation efforts.
- 5 Requires the relevant Departments to develop a strategy to raise public awareness in the United States and abroad about its law enforcement and whistleblower programs

H.R.864 provides mandatory whistleblower rewards with set minimum amounts.

While whistleblowers who work with other government agencies such as the SEC and the IRS on non-wildlife related cases can be awarded between 10% and up to 30% for their contributions to successful prosecutions, wildlife whistle-blowers are often given only token amounts. Further, records show that in the handful of cases for which rewards have been paid by the Fish and Wildlife Service there is little consistency with reward amounts.

H.R.864 would ameliorate this issue as it gives specific award requirements -- not less than 15% and not more than 50% -- and provides a clear timeline for the award to be given. By specifying factors which are specific, uniform, and codified, the Act will provide clarity to both whistleblowers and the government entities working directly on these cases as to the role played by those who blow the whistle in successful law enforcement efforts.

H.R.864. SEC. 2. PURPOSES:

The purposes of this Act are---

(1) to direct Federal agencies to develop a plan of action to implement authorities under existing law to reward whistleblowers who furnish information that leads to an arrest, criminal conviction, civil penalty assessment, or forfeiture of property for any wildlife trafficking violation

(2) to provide a standardized process for determining and adjudicating awards to whistleblowers under authorities under existing laws⁷

H.R.864. SEC. 103. AWARDS TO WHISTLEBLOWERS:

(B) Requirement – The award under paragraph (1) shall not be less than 15 percent and not more than 50 percent, of the amounts received by the United States⁸

Examples of inconsistent rewards as a result of a lack of codified and specific factors to determine awards

Operation Silver Boy: In 2013, three whistleblowers helped law enforcement halt an illegal white-tailed deer breeding and trafficking business in Texas. Law enforcement was able to apprehend six individuals and the combined fines to these individuals were in excess of \$2,000,000. Two whistleblowers received rewards of \$1,000 and a third received \$2,500.

Operation Asian Elephant Tusk: In 2013, a whistleblower assisted law enforcement agents in two cases which resulted in the forfeiture of assets valued at \$197,000. The whistleblower received a reward of \$7,000, or 3.56% of the total money recovered.

In these cases, the amount of rewards is radically deficient. Rewards paid in successful whistleblower programs, including those governing securities and commodity frauds, customs frauds, false claims in federal contracting programs, tax and foreign bribery are all far larger than those currently paid by the Fish and Wildlife Service. Reward minimums and maximums like those provided in H.R.864 will rectify this deficiency and bring wildlife whistleblower programs more in line with best practices.

H.R.864 expands transnational law enforcement to stop wildlife trafficking at the source.

H.R. 864 includes provisions that United States Fish and Wildlife Service (FWS) officers will carry out an International Wildlife Conservation Program to combat wildlife trafficking, poaching, illegal wildlife trade, and other global conservation threats. As part of the program, FWS will assist local agencies or officials responsible for the protection of wildlife in the host country as well as regional partners of the United States in wildlife trafficking investigations, further expanding transnational law enforcement

Even more importantly, the Act mandates that wildlife trafficking becomes an offense under the federal racketeering and organized crime statutes, the Racketeer Influenced and Corrupt Organizations Act (RICO) and Travel Acts. This is the first bill to recognize wildlife trafficking as a form of organized crime, finally giving enforcement the legal teeth to combat this type of crime.

The ability to now seek prosecutions for wildlife trafficking under the RICO and Travel Acts will enable prosecutors to leverage higher penalties and tackle the sophisticated criminal organizations at the heart of wildlife trafficking.

H.R.864. SEC. 2. PURPOSES

The purposes of this Act are---

(10) To make wildlife trafficking a predicate offense under section 1952 of title 18, United States Code (commonly known as the Travel Act), and the racketeering prohibitions of chapter 96 of title 18, United States Code (commonly known as the Racketeer Influenced and Corrupt Organizations Act)⁹

Larger penalties are essential for deterring future crime and rewarding whistleblowers.

fig. 2

Recoveries Under Whistleblower Laws, FY 2011 – 2017

DEPARTMENT	FINES AND SANCTIONS OBTAINED (DOLLARS)	REWARDS PAID (DOLLARS)
False Claims Act (<i>qui tam</i>) ¹⁰	22.4 Billion	3.7 Billion
Internal Revenue ¹¹	2.35 Billion	436.6 Million
Securities and Exchange ¹²	<i>No Data Available</i>	190.9 Million

The need to modernize the wildlife whistleblower laws is further demonstrated by the success of the other laws on which the Wildlife Conservation and Anti-Trafficking Bill (H.R.864) is modeled.

Note: The Securities and Exchange program began in 2011. In FY 2018, the amount of rewards increased to \$168 million. No information available on total sanctions obtained by the United States government.

fig. 3

Number and Dollar Amount of Financial Rewards That the U.S. Fish and Wildlife Service (FWS) Reported Paying for Information on Wildlife Trafficking, FY 2007-2017¹³

FISCAL YEAR	NUMBER OF REWARDS AGENCY REPORTED PAYING	LOWEST REWARD AMOUNTS (DOLLARS)	HIGH REWARD AMOUNTS (DOLLARS)	TOTAL REWARD AMOUNTS (DOLLARS)
2007	2	2,500	10,000	12,500
2008	2	7,500	12,000	19,500
2009	3	2,500	40,000	47,500
2010	4	4,000	30,000	43,500
2011	3	2,000	3,000	7,500
2012	3	3,500	8,500	15,500
2013	7	1,000	20,000	33,500
2014	1	5,000	5,000	5,000
2015	0	0	0	0
2016	0	0	0	0
2017	0	0	0	0
Total	25	-	-	184,500

fig. 4

Number and Dollar Amount of Financial Rewards That the National Oceanic and Atmospheric Administration (NOAA) Reported Paying for Information on Wildlife Trafficking, FY 2007- 2017¹⁴

FISCAL YEAR	NUMBER OF REWARDS AGENCY REPORTED PAYING	LOWEST REWARD AMOUNTS (DOLLARS)	HIGH REWARD AMOUNTS (DOLLARS)	TOTAL REWARD AMOUNTS (DOLLARS)
2007	0	0	0	0
2008	0	0	0	0
2009	0	0	0	0
2010	0	0	0	0
2011	0	0	0	0
2012	1	1,000	1,000	1,000
2013	0	0	0	0
2014	0	0	0	0
2015	1	20,000	20,000	20,000
2016	0	0	0	0
2017	0	0	0	0
Total	2	-	-	21,000

H.R.864 provides greater penalties for wildlife trafficking.

By making wildlife trafficking a predicate offense under the Racketeer Influenced and Corrupt Organizations Act (RICO) and Travel Acts, H.R.864 greatly increases the penalties for wildlife trafficking.

Including wildlife trafficking under RICO will create paths to civil penalties, thereby increasing enforcement opportunities for wildlife advocates and whistleblowers. It allows prosecutors to target anyone who financially benefits from wildlife trafficking, making it possible to target the networks that make trafficking possible. For successful prosecutions, RICO would also provide for treble damages and a sentence of up to 20 years.

Including wildlife trafficking under the Travel Act allows law enforcement and wildlife advocates to target traffickers who travel across state lines or use foreign commerce. As a result, any travel or mail service usage with the intent to further wildlife trafficking would become a crime. Traffickers would be subject to fines and prison up to 20 years.

Currently, a major issue facing agents from the Fish and Wildlife Service (FWS) and other agencies is the size of penalties under current laws are inadequate for handing out sizeable rewards. By making wildlife trafficking a predicate offense under these acts, H.R.864 would greatly increase the size of penalties and by extension, rewards.

H.R.864 mandates restitution to fund conservation efforts, at no cost to the taxpayer.

The Act mandates that monies recovered from wildlife, illegal, unreported, and unregulated (IUU) fishing, and illegal timber cases be put directly into conservation efforts.

The amounts recovered will be used to pay the whistleblower reward and for the benefit of the species impacted by the violation, including but not limited to elephants, rhinoceroses, sharks, and fish. As a result, the funding for conservation will come directly from the criminals, with no cost to the taxpayer.

H.R.864. SEC. 2. PURPOSES

The purposes of this Act are---

(11) To direct any civil penalties, fines, forfeitures, and restitution from wildlife trafficking violations under section 1952 of title 18, United States Code (commonly known as the Travel Act), and the racketeering prohibitions) of chapter 96 of title 18, United States Code (commonly known as the Racketeer Influenced and Corrupt Organizations Act) to support wildlife conservation¹⁵

Each agency needs a plan of action
for deploying whistleblowers.

H.R.864 requires agencies to craft a plan to raise awareness about wildlife whistleblower programs.

Those with information can only come forward - blow the whistle - if they are aware that the avenue to do so exists. It is crucial that a communication plan to potential whistleblowers has both breadth and depth to ensure that no brave whistleblower falls through the cracks. The consequences of this failing are clear: despite millions of dollars in appropriations, and decades having passed, laws enacted by Congress continue to see minimal and limited enforcement, while the vulnerable species continue to march toward extinction.

That's why H.R.864 mandates that agencies must have a strategy to raise public awareness in the United States about the potential awards from wildlife whistleblower programs available under current laws as well as a strategy for the recruitment of whistleblowers.

Both the Securities and Exchange Commission and the Commodity Futures Trading Commission have extremely well-organized web sites dedicated to promoting their whistleblower reward programs. In addition, like the Department of Justice, they issue nationwide press releases each time they pay a reward. Meanwhile, the FOIA documents released by the Fish and Wildlife Services (FWS) indicates that the Service has not issued public statements calling attention to the role of whistleblowers.

H.R.864. SEC. 102. PLAN OF ACTION

(b) REQUIREMENTS – The plan of action under subsection (a) shall—

(1) include a strategy to raise public awareness in the United States and abroad for

reward opportunities for whistleblowers

(2) delineate short-term and long-term goals for increasing anti-wildlife-trafficking enforcement, including recruitment of whistleblowers as appropriate¹⁶

NOAA needs a plan for whistleblowers to help combat IUU fishing

Illegal, unreported, and unregulated (IUU) fishing is one of the greatest threats to the oceans and the continued health of numerous fish and marine species. A 2014 United Nations and Interpol report estimates that illegal fishing constitutes a \$11 billion to \$30 billion USD per year industry. It is estimated that as much as 32% of wild-caught U.S. seafood imports are illegal.

Despite the magnitude of the problem, National Oceanic and Atmosphere Administration's (NOAA) actions has not utilized its whistleblower reward program to prosecute aquatic crimes. Prior to 2019, NOAA had completely failed to implement *any* whistleblower program that was required under law.

In response to this issue, H.R.864 specifically makes violations for illegal, unreported, and unregulated fishing under the Magnuson-Stevens Fishery Conservation and Management Act a predicate offense under section 1956 of title 18, United States Code, and establishes that fines, penalties, and forfeitures from successful prosecutions will be directed towards fisheries enforcement.

H.R.864 recognizes non-profit and nongovernmental organizations as valued partners in this endeavor.

Nongovernmental organizations (NGOs) can play a critical role in facilitating and helping whistleblowers, especially international whistleblowers, and therefore collaboration with NGOs must be fully integrated into any successful program.

H.R.864 encourages the cultivation of partnerships with NGOs by wildlife whistleblower programs, recognizing these relationships as a critical factor in increasing anti-wildlife trafficking enforcement.

H.R.864. SEC. 102. PLAN OF ACTION

(b) REQUIREMENTS – The plan of action under subsection (a) shall—

(3) describe specific actions to be taken to achieve the goals under paragraph (2) and the means necessary to do so, including –

(A) formal partnership with non-governmental organizations¹⁷

PART III

How You Can Help



The Wildlife Conservation & Anti-Trafficking Act

The Wildlife Conservation & Anti-Trafficking Act (H.R.864) was introduced into the U.S. House of Representatives with bipartisan support on January 30th, 2019 by Reps. Garamendi (D-CA) and Young (R-AK). The Act aims to modernize the existing wildlife whistleblower laws and ensure better enforcement. As of September 14th, the Act has 75 Democratic and Republican co-sponsors.

As discussed throughout this report, **H.R.864 addresses all of the major concerns in enforcing wildlife law**, drawing on the practices of the highly successful False Claims Act, Tax, Commodity, Securities, Auto-Safety, and Foreign Corrupt Practices Act whistleblower laws, while also addressing some of the specific issues necessary to successfully fight international wildlife trafficking.

This is the most powerful wildlife anti-trafficking bill of our generation. The Act:

- (1) Creates strong incentives for whistleblowers around the world to report trafficking crimes
- (2) Enhances the laws that can be used to prosecute wildlife traffickers and makes wildlife trafficking a violation under powerful organized crime statutes
- (3) Mandates that all of the fines and penalties collected from successful prosecutions be used for wildlife conservation efforts worldwide.

An urgent need to pass H.R.864

H.R.864 has been endorsed by numerous wildlife and conservation organizations, including the African Wildlife Foundation, Animal Welfare Institute, Association of Zoos and Aquariums, Center for Biological Diversity, Earth Day Network, Environmental Investigation Agency, Humane Society: Legislative Fund, International, and U.S., International Fund for Animal Welfare, Mission Blue/Sylvia Earle Alliance, National Resources Defense Council, Oceana, Panthera, Sea Turtle Conservancy, Thinking Animals United, Vulcan Inc., WildAid, Wildlife Conservation Society, Conservation International, Wildlands Network, and World Wildlife Fund.

It is imperative that this groundbreaking legislation is passed. However, it needs your support.

TAKE ACTION Send a message to Members of Congress and the President urging them to support H.R.864: <https://nationalwhistleblowercenter.salsalabs.org/stop-wildlife-trafficking/index.html>

DONATE Your financial contributions to NWC's Wildlife Program are essential for its continued effectiveness. Please donate: <https://nationalwhistleblowercenter.salsalabs.org/donate/index.html>



WORKS CITED

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14. *Ibid*
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16. *Ibid*
17. *Ibid*

ABOUT US

The National Whistleblower Center (NWC), a non-profit, tax-exempt, non-partisan organization, is the leading whistleblower advocacy organization with an over 30-year history of protecting the right of individuals to report wrongdoing without fear of retaliation and securing rewards to whistleblowers for helping deliver criminal and civil penalties against wrongdoers.

In 2016 NWC's Global Wildlife Whistleblower Program was a Grand Prize Winner in the Global Wildlife Crime Tech Challenge competition, sponsored by USAID in partnership with National Geographic, the Smithsonian Institution, and TRAFFIC. NWC was also selected as the "People's Choice Award" winner, receiving the most public support out of the over 300 contestants from 52 countries. The NWC's wildlife program has also been supported by a generous grant from the Wildcat Foundation and invaluable contributions from member of the public.

This report was written and drafted by Stephen M. Kohn, Chairman of NWC Board of Directors, John Kostyack, Executive Director of NWC, Kait Pararas, Program Associate for NWC, Maya Efrati, former Policy Counsel for NWC, and Anna Wypsen, a former intern for NWC.

The policy recommendations set forth herein represent the official position of the National Whistleblower Center.

ACKNOWLEDGEMENTS

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Comments/Questions?

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