

– THE HIGH VALUE OF FALCONS –

**AS A FORCE FOR THEIR SUSTAINABLE CONSERVATION,
RURAL COMMUNITY DEVELOPMENT, AND ALLEVIATION OF HUMAN POVERTY**

“COMMUNITY DEVELOPMENT – BIOLOGICAL RESEARCH – LAW ENFORCEMENT”

**– DETAILED STATEMENT FOR THE MONGOLIAN PROJECT PROPOSAL –
“THE UNION FOR THE CONSERVATION OF RAPTORS, INC.”
*in cooperation with Dr. Graham Child and The Raptor Management Group™***



The Union for the Conservation of Raptors

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The Consumer Market:

In the Middle East, falconry is the sport most avidly pursued by the Arab Royal Families. Peninsula Arabs collectively spend several hundred million dollars per annum on the following: purchasing and importing new falcons; maintaining falcon collections; customized desert chase vehicles, mobile homes, and peripheral support vehicles. New airstrips and palaces are routinely constructed every year in primary falconry hunting locations. Larger hunting parties typically comprise 2,000 people, with Lockheed C-130 Hercules transport planes landing every day to disgorge political emissaries, entertainers, new hawking parties, new falcons, vehicles, food, newspapers, and high-tech equipment. **Comparatively little of these expenditures benefit conservation of falcons as a resource, or the people who live in the range of falcons, from where they originate in the wild.**

The annual removal of falcons from the wild throughout the world is justified by countries of origin as essential – either for falconry, or in the name of “research”. The purpose of “scientific research” is often given to countries of export by unscrupulous scientists, using field biology much like a “Trojan Horse,” to gain export permits they could not otherwise lawfully obtain. Their true purpose is commercial captive breeding and/or later resale to falconers. Often, falconers themselves underwrite “research” as their true cost of acquiring “research birds” for recreational and/or commercial falconry.

The falcon subspecies most highly prized by Arab Royalty are the Saker falcon (*Falco cherrug*) and the Gyrfalcon (*Falco rusticolus*). Specimens of these subspecies have distinctive – often dramatic – plumage, body size, and other identifying characteristics, by which scientists are able to distinguish them.

Generally, falcons are desirable to falconers when they are sub-adult, or “juvenile.” Often, they are kept for six months to a year and then released as “non-native specimens” to the wild within Middle Eastern territories – which are not their countries of origin. Consequently, the **wild populations of natural, interbreeding falcons – located where supply countries permit specimens to be removed – lose breeding potential permanently. This because exported falcons are “thrown away” at the end of the hunting season in the Middle East, and these falcons are never returned to their native habitat of origin. Furthermore, non-native falcons released into foreign habitat interbreed with local falcons, causing “genetic pollution” – swamping historic gene pools to the detriment of the species – rendering impossible, viable field studies of historic, indigenous genetics.**



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Falcon Smuggling:

A majority of the market demand is for wild “contraband falcons,” and thus, it is a black market. A black market is one that consists of falcons (a) illegally captured from the wild against local and National laws or (b) in which ongoing trade across *international* borders has been made illegal. Illegalities may arise under the laws of importing states or the laws of exporting states, including export requirements which countries adopt because they are signatory to the United Nations “*Convention on International Trade in Endangered Species of Wild Fauna and Flora*” (1973) (hereinafter “C.I.T.E.S.”).

The Parties to the C.I.T.E.S. agreed to subject both the Gyr Falcon and Saker falcon subspecies, and other falcon subspecies, to particularly strict legal limits on export and import in international trade. Trade for the purposes of resale, captive breeding, or scientific research on falcons is subjected to elaborate C.I.T.E.S. *Resolutions*, although they are completely unenforceable, and are in effect, not binding upon the permit authorities in exporting and importing States which are signatory to the C.I.T.E.S.

Too often, C.I.T.E.S. represents a semi-permeable membrane, through which illicit trade readily occurs if an importing or exporting State is involved in black market traffic. To the public, and to small-time smugglers, C.I.T.E.S. has a genuine interdictive effect. However, to several Central Asian and Middle East Governments – intent on smuggling falcons – C.I.T.E.S. is in fact an essential link in a long chain of components necessary to facilitate illegal commerce. The chain begins with *Ministries* and *Academies* of source and destination countries, using field biologists, police, Customs, the Russian Mafia, and Diplomats to smuggle falcons on privately owned courier jets, and sometimes Government owned airlines. The highest level of implementing agents, supplying falcons to Middle East Sheikhs and Princes, move seamlessly between countries with their illicit cargo. The ultimate destinations of this cargo are the most notable and exalted leaders in the Arab world. Because of their political status, and their control of oil economies, Arab leaders are able to move endangered wildlife with impunity.

Compounding the smuggling epidemic in Asian falcons, is the problem that few National law enforcement authorities know how to identify, or sub-speciate, falcon specimens, and few authorities have the manpower to check falcons at the points of export control. Customs and border controls are often easily influenced by bribery. In the case of Muslim countries infused with tribal loyalties and populated by Royal dependents, it is extremely rare for law enforcement authorities to conduct interdiction against their own Rulers who come and go in private jets – and who send dedicated courier jets – loaded with contraband falcons.

Many middlemen in the falcon trade use the same smuggling techniques that have been used to smuggle other types of wildlife from developing countries ¹. Operating quite freely and openly, these smugglers are able to export specimens of wildlife from C.I.T.E.S. Party States, either by (1) not declaring them, (2) by falsely identifying the subspecies of the specimen, or (3) “laundering” them under export permits.

¹ OPERATION FALCON demonstrates numerous cases of breeders and biologists smuggling falcons.



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Illegal “laundering” occurs when C.I.T.E.S. and host-country, permit-issuing authorities authorize cross-border export of:

- ❖ specimens of *other* more common species and subspecies of falcons, that are not normally prohibited from international commerce. For example, illegal exports of C.I.T.E.S. “*Schedule I*” (Endangered) specimens are papered, to falsely identify them as specimens of C.I.T.E.S. “*Schedule II*” (Threatened) subspecies ².
- ❖ specimens papered and C.I.T.E.S.-licensed to be utilized for “biology” or “research,” when in fact the purposes to which falcons are brought into the country of import would disqualify the exporter from obtaining C.I.T.E.S. export permits, from the country of origin ³. Such “research” exports/imports are in fact of a commercial nature;
- ❖ commercially valuable, wild falcons in Central Asia are exchanged for cheap falcons imported from the Middle East. In these cases, smugglers enter supply countries with collections of market-worthless falcons, which are used as live bait to catch wild falcons. The bait-falcons are ultimately set free or killed, in exchange for local wild falcons. Upon departure, the wild, local falcons are falsely presented to Customs, identifying them as a re-export of the cheap falcons, originally imported with C.I.T.E.S. permits and Customs receipts. This “bait-and-switch” technique, is popular among Arab smugglers ;
- ❖ falcons that were not taken from the wild in the country of export, but were in fact imported into (“laundered” through) that country illegally, where re-export documents are provided. For example, eggs are smuggled from Central Asia and Siberia, through breeding facilities in the U.A.E., and subsequently falsely (C.I.T.E.S.) licensed to indicate they were wild-trapped in the Middle East or Asia. This method is primarily used to supply “building-imprinted” falcons for captive breeding operations in Europe.

The archives of the C.I.T.E.S. and other National wildlife law enforcement organizations are full of documentation of these timeless wildlife smuggling techniques. A widely publicized, cooperative international law enforcement operation, or “sting,” known as “OPERATION FALCON,” conducted in the 1980s – documented and intercepted smuggling of contraband falcons between the Middle East, North America, and Europe ⁴.

Conservation Programs In Asian Falcon Range States:

Since the dissolution of the USSR and the emergence of its former republics as independent nation States, smugglers have obtained access to some of the purest and

² C.I.T.E.S. “*Schedule I*” specimens **are not** permitted to cross international borders, for commercial trade. C.I.T.E.S. “*Schedule II*” specimens **are** permitted to cross international borders for commercial trade. Smugglers benefit when they can falsely identify rare, valuable “*Schedule I*” specimens as if they are “*Schedule II*”, so they can freely obtain C.I.T.E.S. licenses to move specimens into commercial trade.

³ There are also exemptions which C.I.T.E.S. grants for scientific or biological research on “*Schedule I*” specimens, whereby specimens are permitted to move across borders – consequently, market countries often create bogus “research” programs as a cover for illicit commerce in “*Endangered*” specimens.

⁴ McKay, Paul, “**The Pilgrim and the Cowboy: A True Tale of Skullduggery, Double-Dealing, and Adventure, in the Exotic World of Falconry,**” McGraw Hill (1989); McKay, Paul, “**Criminal Justice,**” *The Whig Standard Magazine* (October 31, 1987).



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most valuable strains of falcon specimens in the world, in a geographic region that was once forbidden. Competition between Nationals of several Middle Eastern countries has been so destructive that recently, breeding Saker falcons almost cannot be found in Kazakhstan. Illegal smuggling removed 1,500 contraband falcons from Kazakhstan in only one year ⁵.

Most of the countries which lie on the breeding range and migratory route of Asian falcons have not entered into a treaty placing scientifically determined limits on the taking of these magnificent and valuable birds. While most Asian States are signatories to the United Nations *Biodiversity Convention* (see below) and the C.I.T.E.S. – few States have enacted National laws protecting migratory birds from taking. As a practical fact: no country that lies on the migratory route of Asian falcon populations has the law enforcement capacity, to stop falcons from being removed from the wild.

Field Data Distorted to Promote Private Agendas and Personal Philosophies:

No Asian State has a scientifically sound program of sampling to determine the abundance of falcon species found within its borders at any given time of the year. There have been Official Mongolian falcon population estimates promulgated, **simultaneously**, of 1,000 and 21,000 birds ⁶ residing in Mongolia. Even Countries with highly evolved systems for estimating, and testing, their estimates of wildlife species' abundance have a hard time defending their data. In developing countries, where equipment, training, and multiple-year data is minimal or nonexistent, outside “experts” typically assert either liberal or “conservative” estimates, depending on their philosophy or agenda concerning the permissibility of human use ⁷.

In searching for early examples of “scientists” using either their own research, or work by others, to promote a private agenda – we need not look at a “developing” country in Africa or Asia – but rather at the most scientifically proliferate nation on the earth, the United States:

⁵ Boreiko, Vadim, “**Medvedev, Minister of Ecology, Worried About 1,500 Illegal Falcon Exports,**” *Kazakhstan's Caravan-Blitz Newspaper* (July 31, 1995).

⁶ Gruys, Rogier, “**Mongolian Conservation Newsletter,**” Ministry of Nature (September 1997).

Indra, B., “**Falcons Spark Legal Battle,**” *The Mongol Messenger* (November 5, 1997).

Ulziibat, N., “**Should We Trust to Outsider's Word?**” a Mongolian Government newspaper named “**Artinich**” (December 20, 1997).

Adyasuren, T.S., Mongolian “Ministry of Nature” Press Conference (October 29, 1997)

Here is how the *Ministry of Nature* contrived Official GOM falcon population numbers: The Kuwaiti “researchers” (Contracted to export 25 falcons every year – among whom there is not even one biologist) estimated there are 1,000 falcons breeding in Mongolia. *Minister of Nature* Adyasuren Tsohiogyn asked an undergraduate biology student, Tsengeg Purevjav – “how many falcons breed in Mongolia” – to which Tsengeg replied without any support data, he thought there might be 20,000 birds in the Country. The *Minister of Nature* then *added* the Kuwaiti *and* undergraduate student's “figures”, to officially represent there are 21,000 pairs of Saker falcons “registered” by the Mongolian *Ministry of Nature*.

⁷ Mongolia suffered this phenomenon of usupportable “speculation without reliable data” when the United States listed Argali Sheep as threatened in Mongolia. Other examples include Black Duck litigation in the U.S.; ludicrously low protectionist NGO estimates of populations of Bowhead Whales in the Beaufort Sea, finally rebutted by the indigenous “Inupiat Eskimo Whaling Commission”.



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With the decline of the *anatum* peregrine falcon in the western U.S. and its near extirpation in the eastern U.S., the *Peregrine Fund* found an opportunity to solicit Federal and private funds ostensibly for Peregrine recovery, while these funds (i.e., facilities and personnel) were used to produce birds for private use. In the early 1970's, the *Peregrine Fund* found a willing ear at the U.S. *Department of Interior* ("Fish and Wildlife Service") and ignoring the fact that sizable and productive populations of peregrine falcons existed in southern Utah, Arizona, New Mexico, Sonora, and Texas, the *Fund* developed a captive propagation program to release literally thousands of peregrine falcons. Interestingly, they unwittingly admitted in 1988 that already existent, wild populations and small populations in California and elsewhere were sufficient to fully recover the Peregrine falcon in the West, but at that time, the *Peregrine Fund* was expending millions of *Department of Interior* moneys releasing captive-reared birds – often the non-native, hybridized progeny of wild-taken *anatum*, *pealei*, and *tundirus* Peregrines – from locations thousands of miles distant from release sites, and all the while proclaiming that they were "saving" the genuinely Endangered *Falco peregrinus anatum* from extinction.

It is no coincidence the *Peregrine Fund's* income, and their supply of falconry birds ⁸ was linked to the ongoing "Endangered" listing of *anatum* Peregrines in the eastern U.S., a population, which, although near extirpation, could have been rebuilt using birds from the nearest neighboring populations of the same race.

⁸ By 1981, the *Peregrine Fund* supplied more than 70 Gyrfalcons to commercial falcon breeders, and Directors of falconry clubs – many of whom, in turn, gave money and support to the Fund. Taxpayers, through *Interior*, paid an estimated \$250,000 to produce these falconry birds valued at over \$1,750,000. That value of taxpayer support wasn't invested in genuine environmental recovery / restoration programs. – The *P. Fund* supplied Peregrines, Gyrfalcons, and Hybrids to breeders – as foundation breeding stock for commercial farms, in turn selling falcons to Middle East leaders. Selected breeders have donated substantial monies to the *Peregrine Fund*.

– A list of the Fund's breeders includes Steve Baptiste and David Jamieson, ultimately arrested in OPERATION FALCON.

– Mr. Frank Bond, one of three "founding fathers" of the *Peregrine Fund*, who was also a Gubatorial candidate for New Mexico – owned a falcon that was confiscated by USFWS law enforcement. That Gyrfalcon wore no Federal identification band – a violation of the "Migratory Bird Treaty Act" and a potential violation of Federal raptor licensing laws.

– Other *Peregrine Fund* staff were at the center of OPERATION FALCON.

– Other founders, employees, and principals of the *Peregrine Fund*, including Bob Berry & Dan Konkel – have collectively pocketed millions of dollars (and recycled vast sums, via tax exempt "donations", into the *Peregrine Fund*) – all while selling falcons originating from the *Peregrine Fund* colony.

– Long-time members of the *Peregrine Fund's* Board of Directors, who are also financiers of the *P Fund*, have been given multimillion dollar breeding colonies, now used almost exclusively for commercial sales.

– Finally, the *Peregrine Fund* itself, directly exported falcons to the Arabia. These birds were papered as "non-commercial" or research birds – following which the *Peregrine Fund* accepted tax-exempt donations from satisfied Middle East customers. A glaring example is a donation of \$200,000 from the Ruler of Bahrain, Sheikh Issa al-Khalifa – following receipt in the Middle East, of *Peregrine Fund* birds.

– The *Peregrine Fund's* Federal mandate and funding was limited to breeding rare falcons for release into North American ecosystems – NOT for release into the hands of Arab potentates half-way around the world. i.e. The *Peregrine Fund* provided the "research model", used to gain a level of sacred immunity that is beyond reproach – thus enabling traffic by commercial breeders and contemporary smugglers.



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Instead, the Peregrine Fund **replaced** the original population with non-native peregrines from Scotland, Spain, South America, Alaska, and elsewhere. Despite availability of *anatum* peregrines, the *Peregrine Fund's* foundation breeding stock was *Falco peregrinus peleai*, a non-endangered race of peregrine, highly sought after and marketable to falconers. This mongrelization of the eastern population continued until the *anatum* peregrine was down-listed from endangered status. This genetic pollution of peregrines in eastern North America, rather than resulting in “recovery” of the Peregrine, was in fact the **replacement** of the *anatum* Peregrine in eastern North America – and this replacement, with a mongrelized exotic falcon – all at taxpayer’s expense.

We doubt that another example could be found in the annals of conservation where the taxpayer financed the replacement of a non-extinct, endangered species with an exotic, man-made hybrid. In the western U.S., some effort was made to use native stock, however, the *Peregrine Fund's* most prolific male (i.e. responsible for fathering hundreds of release birds) was in fact from the Yukon River, 1500-2000 miles from the release site of its captive-bred progeny.

Concurrent to replacing the North American Peregrine, much of the *Peregrine Fund's* effort was focused on providing *Hybrid* “super-falcons” for employees, Board members, Directors of falconry clubs, Middle East clients, and friends of the *Peregrine Fund*. Also the *Peregrine Fund* very often provided breeding stock for commercial factory farms – and this very often with either hybrids and exotic, non-native strains of falcons. The predominance of falconry “super-birds” (which are often lost during training and during hunts), pose significant threats of genetic pollution and endangerment to wild stocks.

And, when peregrines were finally down-listed from “Endangered” status – the *Peregrine Fund's* founders, Dr. Tom Cade and Bill Burnham, wrote to the *Department of Interior*, requesting Federal / State trapping fees paid by falconers, to capture wild falconry birds, *be not less than* the cost of buying captive-reared falcons from breeding facilities owned by it’s employees and associates. This amounted to price-fixing by the *Peregrine Fund's* commercial breeding interests ⁹, whose businesses are “endangered” by the prospect of a sustainable, wild falcon supply.

⁹ The *Peregrine Fund's* letter to the *Department of Interior* U.S.F.W.S. states: “We further recommend that a State License fee should be charged for the taking of wild Peregrines. Falconers are now used to paying a price for captive-bred birds, and in fairness to breeders and so as to level the incentive for the taking of wild birds in preference to captive-bred ones, we suggest a license fee be set at approximately the going rate for captive-bred birds.”

Implementation of the *Peregrine Fund's* strategy has the effect of saving multi-million dollar commercial falcon breeding monopolies owned by the founders, principles, and supporters of the *Peregrine Fund*. *Peregrine Fund* falcon farms shall lose market dominance and risk collapse IF wild falcons are managed as an inexpensive alternative to captive-bred birds – that is to say, if wild falcons are managed as an economical *sustainable-use* resource, available for seasonal use by falconers, and later released back into nature within their natal States. Furthermore, the *Peregrine Fund's* telling proposal to entice the *Department of Interior* to engage in artificial price-fixing – which only benefits falcon farms – is quite irrelevant to principles of game conservation, management, and falcon restoration biology.



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From the beginning, foundation breeding stock at the *Peregrine Fund* originated from a common, non-endangered race of Peregrines (*Falco peregrinus peleai*), acquired from Dr. Heinz Meng and Mr. Frank Beebe. Subsequent acquisitions focused on enlarging the *Peregrine Fund's* collection of non-endangered Peale's falcons taken from the Aleutian Islands (and later from Spain, South America, and Scotland), despite availability to the project, of specimens representing the genuinely endangered *Falco peregrinus anatum*.

Thus, the *Peregrine Fund* was able to publicly proclaim they are "breeding and releasing Peregrines" (albeit a common non-endangered race) – concurrent to breeding a falconer's dream-bird, and while satisfying the consumptive needs of their own falconers, keen to acquire Peale's Peregrines and exotic Hybrids at any cost. The public was not educated enough to comprehend how they were duped – i.e. how native Peregrines were replaced by non-native, Hybridized specimens – and how a few falconers made out like bandits.

The *Peregrine Fund's* agenda to supply sport-falconry birds – concurrent to their replacement of remnant populations of "Endangered" *anatum* Peregrines, by non-native hybrid falcons – would never have been possible without discretionary interpretation of field data, favoring commercially motivated, special interests.

Mongolia recently eliminated all three species of large falcons from whatever protected status was afforded to them by the "**Red Book**" (a book which lists rare species of wildlife that qualifies species for protective measures, comparable to the "Endangered Species Act")¹⁰. In addition to C.I.T.E.S., all neighboring Asian countries have listed these same species as either "Threatened" or "Endangered", with strong measures of protection. The falcon subspecies deleted from the Mongolian "**Red Book**" have extremely high market value and are targeted by smugglers – while subspecies of falcons that have zero commercial value are granted protected status in Mongolia's "**Red Book**".

70% of juvenile falcons born each spring perish in the wild during their first year due to predation by Golden Eagles, starvation, and disease brought on by low physical condition. If falcons survive beyond their first winter, annual mortality is reduced dramatically. In other words, juvenile falcons are the most expendable element in the equation of natural selection. Breeding adult falcons are less numerous, and therefore more valuable to the continuity of the species in the wild, as they are the birds which promote the gene pool of falcons in the wild. **It is imperative** that exporting and importing countries ban cross-border movement of adult falcons, as the removal of just one of these birds is equivalent to eliminating more than 30 juvenile falcons that are produced by wild, naturally propagating, adult breeders. Therefore, only the high-mortality, juvenile falcons should be permitted into trade.

Predation and disease in migration are not the only causes of loss of recruitment to breeding stocks of falcons in the wild. As previously stated, existing falcon harvest programs in Asian states remove falcons from native breeding ranges, *forever*. In fact, Arabs *throw away* and release most of these falcons – back to nature within the Middle East only six months after acquisition – where they never return to the

¹⁰ Mongolian Ministry of Nature, "**Mongolian Red Book**," Admon (1997).



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breeding stocks in Asia from which they are taken.

We conservatively estimate that *at least* 1,150 falcons were exported by GOM Officials, from Mongolia in 1997, of which 1,000 were exported illegally, and 150 were exported legally. Far more falcons were removed in Western Mongolia by an independent Mongolian Government administration, currently hosting Arab smugglers.

The export Program proposed by this project is a *rental* export, whereby most falcons exported are ultimately *returned* to their natal States of Mongolia, Kazakhstan, et. al. – for release back into nature. Consequently, the number of birds the project estimates would be exported by the Government, under the proposed Project, should have **no adverse** effect upon the breeding potential of the wild stocks from which they are taken in Mongolia. The Project only exports high-mortality juvenile falcons (specimens which are typically subject to 70% attrition, if left in the wild), which are:

- (1) protected from predation by eagles during their first winter in captivity;
- (2) fed well, to avoid starvation and low condition (understanding that starvation is normally a constant threat to wild falcons) – and maintained in high condition to avoid opportunistic disease and parasites that normally afflict wild falcons;
- (3) trained to hunt, significantly advancing the falcons' education on how to hunt game while avoiding eagle predation.

Having learned how to hunt and how to avoid predation, the Project proposes returning falcons to the countries of origin, for quarantine, rehabilitation, and release. Having been safely carried through their first, high mortality winter – with the avian equivalent of graduating with a college degree – this Project creates a *net increase* in falcon populations. This proposal contrasts dramatically with today's carnage wrought by Central Asian and Middle East Governments who conduct unsustainable, killing harvests.

The Project enhances wild falcon stocks in other ways (“Artificial Nest-Site Construction and Enhancement”, avoidance of natural mortality to falcons harvested for export and return, rehabilitation and release of salvaged and confiscated birds, reduction of illegal and unacknowledged harvest rates). The “Nest Site Enhancement Program” conceived and implemented by Dr. David H. Ellis of the *Department of Interior* – with support from U.C.R., and N.A.S.A. – is responsible for creating over 150 artificial nests in Mongolia, annually producing hundreds of baby falcons that otherwise would not exist.

To the contrary, there have been public suggestions recently made by a person whose market access would be reduced by the this proposal. He complained that the taking from the wild of 400 hundred birds a year, for export, would exceed a sustainable level for maintaining falcons across their range in Asia[¶] See [Tab Enclosure: 02 in Exhibit II](#). In fact, if that is true, that individual – who has no expertise whatsoever in Asian falcon population abundance – has indicted the current Mongolian falcon export program.

[¶] Batjargal, D. Citation to Dr. Nick Fox's Press statement in Mongolia. “Unuudur Newspaper” (February 13, 1998)



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Wildlife Markets:

By their very nature, National Government fish and wildlife conservation laws exercise dominion over a country's wildlife resources, ostensibly for the benefit of all the country's people and for the conservation of the resource. As in the case of National laws parceling out rights in timber, minerals, and other natural resources, wildlife conservation laws place restrictions on human access to wildlife resources. They specify the terms and costs of "taking", and of domestic and international movement of the resource in trade.

Traditional models for Government wildlife conservation laws are quite antiquated. The real question is: *to whom* do Governments grant access to the resource and the proceeds of the marketplace? Traditional models for Government conservation law nonetheless –

- ❖ **pass title and ownership, and monopoly access to the peoples' resource, to ownership by private parties;**
- ❖ **determine who can and who cannot participate in the marketplace. Selection typically favors Ministry Officials, their friends, and business associates;**
- ❖ **divert from the people, into the pockets of a relatively few permittees and market middlemen, the proceeds of market sales of these public assets. Such income should instead be awarded to the real owners of the wildlife – impoverished people living in close proximity to the resource – which has the added benefit of providing incentive for indigenous peoples to value and actively protect rare wildlife resources;**
- ❖ **conveys the right to establish where these assets are sold, and the price thereof.**

Asian Falcon Market Locations And Market Mechanisms:

Most Governments sell valuable natural resources in competitive public sales. This ensures a truly competitive world fair market value is recovered for the resource into the Treasury of the nation.

However, in the case of falcons, Government laws have created what is known as the "tragedy of the commons". That is, the resource value of falcons and the market-making function of Government are basically given away.

In falcon markets, market middlemen prefer to acquire their inventories of re-salable wildlife within the country of export, where they can exercise unfair market power over suppliers and there is no price competition ¹². Consequently, they pay an acquisition price that varies highly, in a totally non-competitive market.

Imagine the non-competitive, monopolistic, market power of a falcon market middleman, whom the Government has anointed with export permits, walking around an impoverished country with bundles of immediately available cash. Under such circumstances, a Government itself has allowed the people's resource literally to be given away at less than full market value, and at less than a fair return to the public. The

¹² Sarokoumov, Mikhail, "The Prince Won't Lose," *Caravan-Blitz* (November 09, 1994)



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transfer of money-making rights in wildlife, which these Government laws condone, means no one has an incentive to curtail excessive or “unsustainable” capture of wildlife. This is a failing of the legal structure, which couldn’t possibly be tolerated if the resource in question were timber or minerals.

In addition to the get-rich-quick mentality of Ministry Officials and local suppliers, the falcon market middlemen exploit, manipulate, and hoodwink Government Officials and local suppliers within export countries, as to the true market value of a particular falcon. This is particularly prevalent with regard to rare and spectacular specimens. Selling agents, and even Government Officials, may have no idea which sex, species, subspecies, or plumage stage, of falcons the professional, worldwide consumer most highly prizes.

❖ **There are three ready measures, that can be used to determine the degree to which the Treasuries of Nations are deprived of the true value of their National wildlife assets:**

- (1) whether the Government has in place and enforces, as a matter of law, measures against those who remove the people’s resource from nature, a rational, world-competitive severance pricing system. Wildlife resources sold into world markets shouldn’t be acquired at the cost of a nominal permit fee;**
- (2) the prevalence of under-the-table payments (bribery), with primary benefits flowing to corrupted Officials and implementing agents;**
- (3) excessive delivery costs for wildlife, which middlemen must recover from the ultimate user. With regard to falcons, millions of dollars are spent every year on chartering aircraft and courier jets, to enable covert delivery of black market falcons to Middle East clients.**

This Project’s structured, transparent, sustainable market eliminates the overhead costs of bribery and the overhead costs of courier jets, while recovering genuine competitive market prices from end-users who are at the end of the market chain, with the result that the entirety of income is paid directly to impoverished peoples living in close proximity to the resource – rather than to Asian Officials, Mafia middlemen, and corrupted black market biologists.

Middlemen, who represent and supply falcons to Arab Royalty, and Arab Royal Princes and Sheikhs themselves, are now sending Diplomatic emissaries, “research” teams, and elementary smugglers to Asian countries. Middlemen lavish money on contrived and ineffectual Government “conservation” programs while paying money to Government Officials and private citizens, in order to acquire monopoly rights to purchase and export falcons ¹³.

In the case of falcons, black market trade on the scale of today’s traffic that is conservatively estimated @ 14,000 falcons per annum – would be impossible without field biologists employing “conservation programs” as a means to gain unlimited access

¹³ Dudkin, N., “**The Prince Has Left And Saker Falcons Flew Away – With Him,**” *Caravan-Blitz Newspaper* (December 7, 1994).



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to commercially valuable falcons that are smuggled with impunity.

It is commonplace in developing countries throughout the world ¹⁴ that Government Officials charged with protecting fish and wildlife from unlawful taking or trade are compromised by the lure of personal gain on the sale of Official licenses for “taking” and “export”. U.C.R. possesses more than 100 newspaper articles from Kazakhstan, Mongolia, and Russia, documenting such activities. We possess photocopies of “Official” Government letters, and licenses bought from Asian Government Officials by Arab Diplomats, authorizing the capture and removal of falcons.

In more than one case, status of Diplomatic Immunity ¹⁵ has been granted to smugglers, while in fact no Diplomatic mission was accomplished while the “Diplomats” were catching falcons in the wilderness. When responsible law enforcement authorities intercepted the Diplomats, embarrassing incidents occurred ¹⁶.

More than one wealthy Middle East falconer has chartered jets to the U.S.A., Mexico, Canada, Asia, and Spain, to collect and smuggle falcons. One notable example is the dispatch from Saudi Arabia of a Tri-Star jumbo jet, staffed by at least twenty people, to an Asian country to pick up only 21 “Officially” permitted and CITES licensed falcons. This means several things:

- (1) the true end-market value of those falcons, which market middlemen recover in the Middle East is so much higher than the purchase price paid for these falcons inside Mongolia, that these middlemen could justify the extravagance of spending (est. staff, fuel, airport, misc. expenses) \$400,000 round trip jumbo jet charter fee between Ulaanbaatar and Saudi Arabia. This jet was sent on similar dispatches, once per month, during each falcon season since 1994;
- (2) the economy of Mongolia was deprived of the true value of the people’s assets;
- (3) suppliers and middlemen were Officially authorized by the Government – to divert to themselves – huge parts of the value of the people’s assets;
- (4) indigenous people were deprived of much-needed income, which went instead to permit fees, unscrupulous middlemen, and under-the-table payments.

¹⁴ One C.I.T.E.S. permit officer in India charged a \$10,000 personal fee to grant CITES export permits, then absconded. Similar problems occurred throughout Africa with elephant ivory and rhino horn trade.

¹⁵ Velyn, Anton, “**Charter Of Diplomatic Immunity For An Arabic Sheikh,**” *Caravan-Blitz Newspaper* (October 30, 1994). Includes photocopy of Kazakhstan’s “Ministry of Foreign Affairs” status of “Diplomatic Immunity” letter granted to a delegation of U.A.E. “Ministry of State for Foreign Affairs” Diplomats working for Sheikh Hamdan bin Zayed, designating 6 jeeps as U.A.E. sovereign territory. The U.A.E. diplomats were caught in the field, with their vehicles loaded with contraband falcons.

¹⁶ Tokaev, K., the Kazakhstan “Minister of Foreign Affairs”, “**Editorial Letter Published at Request of Minister Tokaev,**” *Caravan-Blitz Newspaper* (Registration # 4494, October 31, 1994). The Minister claims innocence, expressing outrage that U.A.E. Diplomats working for Sheikh Hamdan, smuggled Kazakhstan falcons, masquerading as U.A.E. Diplomats and using the Minister’s protection.

– Velyn, Anton, “**The Royal Hunt is Going On – Does the ‘Minister of State for Foreign Affairs’ Know to Whom He Gives the Diplomatic Charter of Immunity?’**” *Caravan-Blitz Newspaper* (November 2, 1994).



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Problems For Sustainable Use Of Falcons In Asia Are Not Unique:

The patterns of resource-use, of falcons in Asian countries that lie along their migratory range, and the institutional responses within Governments, are common in the annals of worldwide natural resource conservation. Patterns of over-use and Official corruption have been repeated time and again over the centuries in developing and developed countries throughout the world. This has been true with respect to most other types of natural resources, renewable and nonrenewable ¹⁷.

Even in developed countries, when it comes to fish and wildlife conservation, Government-authorized capture restrictions and controls are generally ineffective, as a practical matter. The secretive & remote practices of hunting or live-capture, the small numbers & under-funding of law enforcement organizations, and the lack of support for these restrictions among local peoples, combine to render harvest (“taking”) restrictions ineffective.

A common occurrence in developing countries is that Government Officials and their favored cohorts, expropriate to themselves the financial returns from use of National wildlife assets at unsustainable levels, then abscond with the money when the supply runs out ¹⁸. This is possible because the National laws take away from those citizens, who live in close proximity to where the resource exists in nature, their legal right to benefit from the resource, and/or to participate in any level of resource management, recovery, or study. In the case of falcons, “field biology” and contrived conservation programs are used as **exclusionary tools**, to *prevent* public access to the resource, so that Ministers, Officials, their friends and implementing agents are the only elite group of beneficiaries. Consequently, local citizens are deprived of any real-world incentives, and they are deprived of any financial incentives, to reject local poaching by Government Officials.

Market middlemen aren't the only entities working to deprive local peoples from the true value of wildlife resources. Some Western NGOs, bilateral & multinational foreign aid agencies, conservation organizations, and private foundations – have been known to throw money at National wildlife conservation agencies and land-trust programs, with the covert intent, to *exclude* sustainable wildlife-use and land access by local peoples. These financial grants and programs often do not effect actual conservation of species in the wild ¹⁹, and in some cases the money ends up in private bank accounts of Government Officials ²⁰.

Advocates of wildlife trade bans do not want a financial value placed on wildlife resources. They are often insensitive to the legitimate needs of local peoples to utilize and to gain benefits from sustainable-use, access rights, and sale of local wildlife resources ²¹.

¹⁷ Hancock, Graham, “**Lords of Poverty**,” Atlantic Monthly Press (1989).

¹⁸ Bonner, Raymond, “**At The Hand Of Man**,” Knopf (1993).

¹⁹ Schaller, George B., “**The Last Panda**,” The University of Chicago Press (1993).

²⁰ Bonner, Raymond, “**At the Hand of Man**,” *supra n. 2*, at 135 (corruption in elephant ivory trade, by officials of Kenya Wildlife Department).

²¹ Examples of this are Western agency grants for (1) excluding indigenous peoples from areas around



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In the case of migratory wildlife species that move across international boundaries, countries allow capture of specimens which, very often, were born and reared in other countries. Conservation of Asian falcons requires coordinated, multinational Treaty protection. There is no collaborative Treaty among Asian *States* for conservation of migratory birds, including falcons ²². A significant number of falcons captured on migration in Mongolia are born in Russia, to which normally they would return the following spring to breed and produce offspring – if only they were not removed – i.e. harvested and smuggled by trappers, sponsored by Gulf-based Sheikhs and Princes.

The near-universal patterns, and problems for Government managers of natural resources in developing countries, led directly to the adoption of a world conservation strategy of “*sustainable-use*,” now embodied in the “Convention on Biological Diversity” and “Agenda 21”, adopted at the “Earth Summit” at Rio De Janeiro in 1992 ²³. Mongolia is a signatory to that Convention.

The boldest facet of the U.N. “Convention on Biological Diversity” and “Agenda 21” is the idea that National Governments must pass laws recognizing the right of local peoples to benefit from their own resources. They must give to local citizens – people who live where a resource is found in nature – not only a legally vested right to control outsiders’ access to the resource, but most of the financial interest and benefit from that use. The world community thus states that resources must provide benefits to local communities, with these resources (and benefits) worth preserving *sustainably* over the long run – rather than viewing community-benefit from the resource, as a menace, or the subject of indifference. In this way, genuine interest and incentives are created for resource conservation over the long term, while inhibiting get-rich-quick corruption by Government Officials and their cronies.

The falcon markets in each Asian and Middle Eastern State have all the characteristics which the Biodiversity Treaty seeks to terminate:

- (1) rampant corruption at National Government levels;
- (2) no incentives and vested interest by local citizens, in “*sustainable-use*”;
- (3) no biologically sound conservation limits on “taking” (harvests and exports).

On occasions where field “research” is undertaken, more often than not, biologists have a financial interest in mis-representing field data. Most field biologists cleared for falcon “research” in Central Asia are: owners of commercial factory falcon farms; employees of Arab leaders proven to engage in black market traffic; and/or directly exporting falcons to Middle East buyers under the guise of “non-commercial research” – for which service,

Siberia’s Lake Baikal (2) controversies that led to revision of C.I.T.E.S. **Conf. Res. 2.11.** and (3) recent down-listing of elephants by C.I.T.E.S.

See also “**West Pours Its Funds Into Studies (of Russia’s Lake Baikal reserve),**” *Washington Post*, p. A-14 (May 31, 1994).

²² North American migratory birds are collectively protected under the “Migratory Bird Treaty”, jointly signed by the United States, Canada, and Mexico. No such Treaty exists to protect Central Asian birds.

²³ Can be reprinted from: <http://sedac.ciesin.org/pidb/texts/a21/a21-contents.html>



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these biologists are the primary beneficiaries.

When National legislatures critique their wildlife conservation laws for effectiveness under principles of the “World Conservation Strategy” in Agenda 21, they would look at:

- ❖ **who** manages and **controls** access to (taking of) wildlife. That is, how is “taking” controlled, by National and/or/versus Local, regional, Provincial levels of Government;
- ❖ **who** is allowed to establish market price;
- ❖ **who** is allowed receive economic returns and financial benefits;
- ❖ **how** are they required to utilize the economic returns, which flow into the country from:
 - (1) issuance of capture / trapping permits;
 - (2) implementation of field biology programs;
 - (3) issuance of local export permits and/or international C.I.T.E.S. export licenses;
 - (4) guiding hunters who capture wildlife;
 - (5) the sale of captured wildlife.

Anyone knowledgeable about international wildlife conservation policy today knows that the most cutting-edge and effective National programs for conservation and community-based sustainable development of commercially valuable wildlife resources, are those which were adopted in the Southern Africa States of Namibia, Zambia, Zimbabwe²⁴, and Botswana. The challenges to make falcon removals from Asia sustainable over the long term, are similar to challenges presented for the conservation of commercially valuable wildlife species in those African States. Therefore, the Proposal below is modeled on the common principles and legal structures of those programs:

²⁴ CAMPFIRE is the first example given by the “World Resources Institute” of a “success story” attributed to the objectives of *Agenda 21*: “The Campfire Program in Zimbabwe has returned ownership of wildlife to local communities, boosting their commitment to resource conservation and returning greater benefits to communities through sale of wildlife products.” www.wri.org/rio-5/rio5biod.html



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– CONCLUSION –

To Arab Royalty, The Raptor Management Group™ Proposes Something Better:

Arab Royal Families honestly cannot want today's international public image, whereby they bankroll an organized Mafia of Government-based falcon smugglers, illegally extracting and transporting resource specimens from unprotected falcon stocks, while opportunistically taking advantage of impoverished nations with no meaningful conservation programs. The contraband falcon market rivals the narcotic trade in the illicit profit made by middlemen, with expenditures collectively exceeding \$300,000,000 per annum. But there is one feature of the current black market in falcons which distinguishes it from the drug trade: it is financed and directed by Arab Royalty.

The Raptor Management Group™²⁵ Projects offer to Arab falconers a way –

- ❖ **to satisfy their passion for sport falcons, by maintaining access to falcons that are sustainably removed from the wild, then returned back to nature.** Today's supply of falcons is certain to cause regional extinction of already-rare falcons. In contrast to this, falcons must be managed transparently, in a program designed for long-term sustainability;
- ❖ **to avoid their adverse international image as “saboteurs of falcon conservation”.** For maintaining access to rare sport falcons, Middle East Sheikhs and Princes knowingly:
 - (1) obstruct bonafide wildlife conservation programs, which are replaced with wholesale extraction programs operating under the guise of “science”;
 - (2) support an organized Mafia across ex-Soviet Asia, which includes prominent former KGB Officials now serving black market traffic through KGB subsidiaries including *Moscow Special Services*, the *Federal Border Guards Service* (FPS); the *Federal Security Service* (the FSB, previously known as “Federal Counterintelligence Service”); and the *Foreign Intelligence Service* (SVR);
 - (3) harbor two al-Qaeida arms dealers who used the falcon trade to build their start-up capital for aircraft acquisition, and who established brotherly friendships with Middle East leaders, on the back of falcon trade. Access to Middle East leaders through the falcon trade enabled al-Qaeida to move weapons across international borders, with Visa clearance and support from Gulf leaders. One of these two al-Qaeida terrorists has been granted U.A.E. citizenship by a “Triad” Sheikh;
 - (4) perpetrate fraud, while illegally lobbying the United States Government – consequently interfering in US foreign policy to the detriment of the United States;
 - (5) tortiously interfere with U.S. Federal Employees;
 - (6) participate in and/or conspire to commit murder and mayhem.

²⁵ The Raptor Management Group™ is a trademark of International Raptor Management, Inc., designating U.C.R. / I.R.M. Projects. See www.SaveTheFalcons.org



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These truths are fully documented within U.C.R. *Evidentiary Exhibits* and the website ²⁶.

- ❖ **to improve conditions and enhance populations of falcons in the wild.** This Program has numerous measures, certain to protect and enlarge native falcon populations, already crashed in ex-Soviet Asian regions controlled by the U.A.E., Saudi Arabia, and Kuwait;
- ❖ **to pay a fair price for falcons, concurrent to eliminating the “middlemen” racket.** Today’s implementing agents, working for Arab falcon buyers, extort inflated end-user prices, to maintain the “wildlife conservation” scams by foreign Ministries, E.R.W.D.A., and N.A.R.C. – when their primary purpose is to prospect for falcon extractions;
- ❖ **to see the funds they expend on falcon acquisition and delivery, alleviate poverty in Asia falcon territories.** Today’s black market benefits only a few middlemen, biologists and corrupted Officials. This is illegal, and the Raptor Management Group™ proposes measures that benefit the true owners of the resource, living in falcon-supply countries.

***To The Mongolian People:
We Propose an Anti-Poverty Program
Funded by the Value of Falcons***

The poverty of indigenous peoples in Mongolia will be reduced, and the “Biodiversity Treaty” will have a glowing success story. Mongolia will go down in history as having implemented one of the greatest achievements in the annals of international wildlife conservation. Income of several million dollars will enter the Mongolian *Treasury* from the sale of *fewer* falcons removed from the wild – with income considerably higher than today’s “Official” sales. Net proceeds from fair market sale of the people’s wildlife assets will not be diverted to National Government agencies and to a few local middlemen. The greatest share possible, of market returns, will be redistributed by laws directly to, and for the benefit of, individual local peoples in falcon producing territories and “Aimag” provinces – because these are the only persons with any real ability to protect falcons in the wild. These are the persons who need incentives to implement conservation programs.

This forward-thinking Program will create a *net increase* in wild falcon breeding populations indigenous to Central Asia. Current National falcon export programs have produced a drastic decrease of recruitment to and replenishment of, wild falcon breeding stocks – often to the point of regional extirpation.

Market funds will be invested to enhance the supply of wild falcons in Asia by funding:

- (1) rewards for citizens against poachers, in the “Resource Reward Program™”;
- (2) upgrading the care of falcons (a) confiscated from smugglers (b) rented by end-users, and (c) ultimately released and returned to wild natal stocks;
- (3) scientifically defensible research, available for review by a community of peers, on species abundance, sustainable-use management, and quota-setting;
- (4) recovery of extirpated falcon populations, via (a) the *Department of Interior*

²⁶ See www.SaveTheFalcons.org



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Personnel's "Nest-Site Enhancement Program" (b) rehabilitation and release of birds injured in black market trade (c) capacity-building education and field Programs.

A new generation of Mongolian youth will be educated. The Government will authorize capture of falcons for "research", only when that research is truly necessary, as determined by world authorities, *and then only* if those falcons are ultimately returned to Mongolian wild natal breeding stock. **There is no defensible need to remove invaluable Mongolian breeding stock to foreign breeders and "research stations"** ²⁷, as **Mongolians should be educated, equipped, and provided incentives toward sustainable management** ²⁸ of their own resources *inside* Mongolia. Research will be conducted under C.I.T.E.S. regulatory guidance where it should be: "in situ", *within the country* from which today's "research" specimens were removed from the wild.

By disenfranchising opportunistic middlemen – the ultimate end-users, who buy sport falcons within a genuinely competitive, world marketplace, shall deliver the full yield of funding for these domestic, Asian falcon management programs. Arab funds shall cease being diverted from actual, real falcon conservation, and into the pockets of middlemen, corrupted Officials, and commercial falcon breeders masquerading as "research scientists" – with market funds correctly dedicated to alleviation of human poverty. This way, Arab Royalty will see their expenses for falcon acquisition costs support three noble public policy objectives which they share with "Agenda 21": wildlife conservation, the alleviation of poverty, and rural community development.

OPPOSITION BY COMMERCIAL FALCON BREEDERS:

Opposition From Commercial, Falcon Factory Farms, Owned by "Researchers":

Commercial captive breeding operations are understandably threatened by wild-capture programs. Market demand for farm falcons will collapse IF wild falcons are sustainably managed as an inexpensive alternative to captive-bred birds – that is to say, if wild falcons are available to falconers, for seasonal use and subsequent return to nature.

Because the most powerful commercial falcon breeders are biologists who built their multi-million dollar inventory on the back of contrived "research" programs, the defense for the existence of their farms is cloaked in flawed claims they are "protecting wild falcons by selling captive-bred progeny" which are in fact mongrelized non-natives, responsible for causing genetic pollution of wild, natal stock. Other expert researchers –

²⁷ The authors are unaware of any export of breeding stock from Asia "for research purposes", where that breeding stock is not maintained for primarily commercial purposes, for supplying expensive falcons to the Middle East markets. The "research" label has been hijacked as an excuse for commercial breeders.

²⁸ U.C.R. opposes establishment of captive breeding operations that (1) introduce non-native hybrids into the ecosystem and (2) cause genetic pollution (3) concentrate vast income into the pockets of factory farm owners – income which rightly belongs to the citizens of the countries which produce marketable falcons. A better alternative, is to consider the *entire Country* as an expansive natural farm, capable of supplying the finest wild birds which, if managed sustainably, produces the best quality falcons over the long term.



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not conflicted by commerce – recognize the charade.

Also, OPERATION FALCON demonstrates that, among approximately 300 arrests and convictions of falcon smugglers in the United States, Canada, England, France, Finland, and Germany, with related interdiction in Iceland, Greenland, Spain, Egypt, Mexico, and Zimbabwe – the largest component of smugglers are from among the falcon farm and within the falcon “research” community.

It is a *conflict of interest* for captive breeders, including U.A.E. interests, to lead “conservation” initiatives for wild falcons – whose eggs and babies are ultimately looted and illegally laundered, to create foundation breeding stock for captive breeding farms. See above heading [“Field Data Distorted...”](#) See also above Footnote: **8** and Footnote: **9**

Captive breeders are the most powerful lobbyists against wild-capture initiatives – regardless of the fact this Program is a classic model of *sustainable-use* management principles, as advocated by the United Nations *Biodiversity Convention*. In this regard, U.C.R.’s greatest opponents are a small group of biologists who are today making millions of dollars through the sale of falcons, destined for Middle East markets, and papered as C.I.T.E.S. “non-commercial” exports. See above Footnote:

This project has been submitted every year since 1994, to Governments of Kazakhstan, Mongolia, and Russia. Notably, one of the more overt demonstrations of Middle East “special-interest” was enacted on the day Kazakhstan’s *Minister of Ecology*, Medvedev, was scheduled to sign the Program Contract, when the U.A.E. Government flew in their employees Nick Fox, Dr. Hornby, & Dr. Fred Launay – with these Officials representing the U.A.E. Government, “World Wildlife Fund”, commercial captive breeding interests. These representatives opposed and successfully blocked *sustainable-use* conservation measures, they opposed environmental law enforcement, and then took Draconian steps to ban *Department of Interior* field biologists from Asia, after *Interior* learned of U.A.E. extractions to commercial falcon farms, papered as C.I.T.E.S. “non-commercial” exports.

Each year this Program has been rejected, in lieu of bribery from the U.A.E., Saudi Arabian, and Kuwaiti Governments – paid directly to Central Asian Officials. Each year, U.A.E. interests in particular, have actively opposed law enforcement – providing cover for their own smugglers – while falcon populations have crashed to the point of the regional extinction of rare color morphs, including commercially valuable and exotic sub-species.

Throughout these years, the strength of the falcon Mafia has grown to export 14,000 falcons annually valued at U.S. \$300,000,000 – while Arab and Central Asian Governments, their conservation agencies, Nick Fox, Hornby, Potapov, Launay, and W.W.F. have remained – practically speaking – silent. Their silence, explained by their complicity in black market trade, is demonstrated in the U.C.R. *Evidentiary Exhibits* ²⁹.

While opposing law enforcement, and directly participating in black market extirpation of falcons across Asia, these same “researchers”, funded by Middle East Sheikhs and

²⁹ See <http://www.savethefalcons.org/>



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Princes, have created the worlds most extraordinary and priceless collections of captive-breeding falcons – many of which were smuggled out of Asia and laundered into their facilities as eggs – with help from paid, local C.I.T.E.S. Officials.

The intent of this cabal by factory-farm-breeders, is to:

- (1) privately enrich themselves, on the back of black market trade in wild falcons;
- (2) launder wild-origin eggs, hatched and conditioned in the U.A.E. as *site-imprinted*, foundation breeding stock – destined for industrial-scale factory farms in the Middle East, Europe, and beyond;
- (3) once black market commerce has wiped out wild falcons from entire regions, declare falcons are in danger of extinction, to justify a C.I.T.E.S. up-listing to *Schedule I Endangered* – and a trade ban on commerce in wild Asian falcons;
- (4) establish a market monopoly dominated by farm falcons, as the consequence of regional extinctions of wild Asian falcons, and C.I.T.E.S. prohibitions vis-à-vis legal unavailability of wild-trapped falcons – for which breeders are responsible.

This is a vertical black market, representing Government-to-Government commerce. This modus operandi was recognized in 1999, and has been systematically implemented by U.A.E. and British smugglers, who are the ringleaders of this Machiavellian charade. Curiously, Saudi and U.A.E. Princes and Sheikhs as end-users were the last to comprehend how they were manipulated by falcon farm breeders, to the extent Arab money was used to bankroll regional extinction of Asian falcons, for the purpose of giving market control to private breeders. Nevertheless, the most vocal opponents of the U.C.R. Program are parties with a vested interest in the black market, and especially commercial falcon breeders, masquerading as scientists.

PROJECT HIGHLIGHTS:

“Resource Reward Program™”

From operating funds, I.R.M. offers any citizen of Mongolia a reward of US \$1,000.00 for every contraband falcon that is reported to a designated agency, and determined as exportable. The informant will be issued a numbered certificate relative to the report. Anonymity is maintained. The informant may collect the reward only after (a) contraband falcons are confiscated (b) at least one smuggler is arrested in association with the falcons, and (c) the smuggler is convicted of a smuggling offense, as defined by law.

In “Phase II” – after smuggling is eliminated in Mongolia – the Government itself will export falcons in numbers equal to 10% of the numbers of juvenile falcons produced by the “Nest Site Enhancement Program”, conceived and implemented by Dr. David H. Ellis from the U.S. *Department of Interior*.

Furthermore, National and regional falcon harvest quotas shall be established, and determined by a multinational team of biologists, including trained students from the *Ulaanbaatar University*, who are not conflicted by linkage to falcon commerce. It is



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essential that parties scientifically determining falcon harvest quotas, have no history of benefiting from sales of falcons, as such activity represents a clear conflict of interest.

Resource Flow of Market Revenue:

Under today's black market, Mongolia is responsible for smuggling through Official channels to the U.A.E., Saudi Arabia, and Kuwait – several thousand falcons per annum. This number is not sustainable, and will continue until there is pressure brought upon the Government to concede – albeit under duress – to obey international laws, Conventions, and Treaties, to which Mongolia is a signatory. In this regard, the U.C.R. Program also provides substantial incentives to the citizens of Mongolia, to conserve falcons and to demand compliance by their own, elected Government Officials.

One son of the Saudi *Minister of Interior* Prince Naif, Contracted to export 800 falcons from Mongolia to his Saudi father. Officially, the Prince Mohammed bin Naif pays the GOM only U.S. \$2,500 for each of 800 falcons – i.e. the gross income realized by the Government of Mongolia “Officially” totals \$2,000,000 for 800 falcons [Tab Enclosure: 36 in ENCLOSURES TO EXHIBIT I](#)

“Unofficial” income realized by this same Contract exceeds \$18,000 per bird – all to the pockets of Mongolian C.I.T.E.S. Officials, Ministry of Nature Officials, biologists, Customs, and local Police. [THE BRIEF and ACTIONS OF STATE](#) and [EXHIBIT I and Tab Enclosure: 35 in ENCLOSURES TO EXHIBIT I](#)

U.C.R. *Personnel* were first to discover and publicly disclose this detrimental Contract, and the loss of income and value to the citizens and the GOM. Nevertheless, the Saudi *Minister of Interior* Prince Naif and his extraction Contract continue to be honored, due to Official misconduct and high-level corruption of key, targeted Officials.

To illustrate the loss of income to the GOM by the Saudi Contract: Under the current Saudi Contract, 800 falcons are authorized for trapping and export. If only half that number (400 falcons ³⁰) are instead confiscated from smugglers, and also fledged in the *Nest-Site Construction and Enhancement Program™* – and then if those 400 falcons are exported from Mongolia for seasonal rent to falconers at an average, conservative *unit rental price* of U.S. \$20,000 – then a gross income of \$8,000,000 would be generated.

What is better for Mongolia – \$1,000,000 under today's Saudi Contract, or \$8,000,000 under a Saudi or U.C.R. Contract that is awarding full market value to the natal Country?

After marketing and other Project operating expenses are recovered, under the U.C.R. Program the right to net Program revenues would be awarded to the citizens of Mongolia, I.R.M., U.C.R. conservation and education Programs, law reform and law enforcement. *Ninety percent* of net revenues shall be allocable by law and by this Project, to be awarded to local Treasuries within each “Aimag” province where falcons are conserved, to conservation organizations, education and exchange programs, and for the alleviation

³⁰ U.C.R. does not advocate a 400 falcon export. This number is discussed only in a comparative sense, relative to the patently egregious 800 falcon Saudi extraction Contract.



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of poverty. These funds *will not* disappear in the State Treasury, but will be fully accountable, and distributed *directly* to the citizens of Mongolia, thus providing strong incentives for genuine environmental reform measures.

Law Reform For Community Based Sustainable Use Of Falcons:

New laws protecting falcons must be implemented in the context of (a) international Treaties (i.e., C.I.T.E.S. and the *Biodiversity Convention*) and (b) Mongolian cultural traditions. U.C.R. will rely upon referrals of foreign, international wildlife law experts, to collaborate with Dr. S. Narangerel, the President of the “*Association of Mongolian Advocates*,”³¹ in this significant legal drafting effort. Dr. Narangerel is Contracted with his team of Mongolian lawyers, to begin this collaborative project.

“Science Exchange Program”

Dr. David Ellis, U.S. *Department of the Interior*, has designed and implemented a multinational exchange program with students from the *University of Ulaanbaatar* and other foreign countries. Mongolian students must once again see potential for gainful employment in the pursuit of science. For this reason Dr. Ellis designed a program which will involve 100+ Mongolian field students in his research. His most dedicated students have been sent to the U.S. for specialized training, understanding they are returning to Mongolia to bear the responsibility of conserving Mongolia’s natural heritage.

“Nest Site Construction and Enhancement Program”TM Developed By Dr. David H. Ellis, U.S. *Department of Interior*:

The limiting factor for Saker falcons (*Falco cherrug*) in Mongolia is nest site availability, as food is generally abundant. Many falcons simply cannot find nests, and they lay eggs on the ground where they are preyed upon by foxes and wolves.

U.C.R. co-sponsored construction of the first 60 Mongolian artificial nest sites built by Dr. Ellis in 1997, donating \$10,000 for *Department of Interior* field research and biology. These nests produced substantial numbers³² of additional fledged juveniles by 1998 – juvenile production that would not otherwise exist due to the scarcity of suitable nest sites. More than 150 artificial nest sites have been constructed by 1999, with support from the *Department of Interior* and N.A.S.A. Construction of 500 artificial aeries are ultimately planned by Dr. Ellis, to boost supplemental Mongolian juvenile falcon production to more than 1,500 birds per annum.

³¹ The “Association of Mongolian Advocates” is equivalent to the U.S. Bar. Professor Narangerel, a former member of Parliament, has promoted the U.C.R. Program since 1995. His advocacy won Dr. Narangerel “Academician” status with honorary Diploma from *Chingges Khaan Academy* “For Fighting Corruption of Mongolian Government Officials”. Alan H. Parrot was awarded “Academician” status with an honorary Diploma, “For Saving the Falcons of Chingges Khaan”. Dr. David Ellis, *Department of Interior* was awarded “Academician” status for “Research and Conservation of Saker falcons”.

³² In 1998 twenty falcons were fledged from *Interior*’s initial colony of 60 artificial nests. In 1999 thirty falcons were fledged; in 2000, 2001, and 2002, forty falcons were fledged each year (conservatively) totaling at least 170 falcons fledged from the “Nest Site Enhancement Program”.



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The cost of each nest is U.S. \$6. Each nest is capable of producing 3 falcons per annum. This represents the most viable alternative to elaborate captive breeding programs, as exemplified by the *Peregrine Fund*, which cost taxpayers more than \$3,000 per falcon. Captive breeding programs are detrimental to the environment, due to the release of non-native hybrid falcons. “Nest-Site Enhancement” poses no risk of genetic pollution.

Mongolia cancelled Dr. Ellis’s Contract signed with the *Academy of Sciences*, which authorized *Interior’s Employee* to build artificial nests. The GOM complained to the *Department of Interior* that Dr. Ellis’s nests were causing power outages, then demanded that the *Department of Interior* surrender the GPS locations of his nests! Once Dr. Ellis’s “Nest Site Enhancement Program” was slandered as detrimental to the birds, and the Contract cancelled, U.A.E. “researchers” arrived to implement the same Program. This is another example of a community of smugglers usurping legitimate rights of foreign researchers – to remove credible science monitors, and to create the appearance of bonafide research Programs – in order to prevent transparency and disclosures of GOM and Gulf-based laundering and black market activities.

Finally, in order to remove the *Department of Interior* from Mongolia, and to prevent ongoing monitoring of U.A.E. black market extractions – Mongolian C.I.T.E.S. Officials, Dr. Fox and threats of the U.A.E. *Minister of Foreign Affairs* Sheikh Hamdan bin Zayed – lobbied the U.S. *Departments of State* and *Interior* to ban Dr. Ellis from Mongolia.

“Falcon Hospital and Research Center”

Falcons confiscated from smugglers require rehabilitation at the U.C.R. *Falcon Hospital and Research Center*, prior to reintroduction to nature.

Students from the *University of Ulaanbaatar* shall be trained in modern avian medicine and falconry rehabilitation techniques including “hacking”. The most dedicated students will be sent to the U.S. for technical training, and ultimate return to Mongolia for specialized work.

Hospital facilities will be supervised by Dr. Kathleen Ramsay, a renowned veterinary doctor with specialized training in raptor medicine. The research branch will be supervised by Dr. David H. Ellis of the *Department of Interior*, with help from visiting scientists from around the world.

Falcon Rental Auction:

Exported falcons will be the property of the State of Mongolia. Of falcons confiscated from smugglers, 100% of breeding adults and 100% of injured falcons will be consigned to the “Falcon Rehabilitation Hospital”, for ultimate release into nature. Without exception, no adult breeding falcons will be permitted for export. Of the remaining juvenile falcons confiscated from smugglers, females and some males will be exported to an auction that I.R.M. conducts for the Mongolian Government, *in the Middle East*.



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Said auctions will provide the advantage of being truly competitive, by delivering legal, healthy falcons directly to buyers, who decide (a) if they will buy the falcon ³³, and (b) how much they will pay.

In the current black marketplace, the buyer is obligated to purchase entire shipments of falcons, no matter what their condition. In an auction setting, black-market middlemen are cut out of the equation because the State delivers the birds directly to end-users.

“Return Incentive Program™”

Rental falcons returned to I.R.M. under the Return Incentive Program™ have avoided *both* natural and man-made losses, to which wild Asian falcons are typically exposed. Rental falcons have been carried through their first high-mortality winter, where on average, 70% of juveniles expire due to starvation, disease brought on by low condition, and predation by Golden Eagles. During 8 months held in captivity as falconry birds, these rental falcons:

- (1) are well fed and in high condition;
- (2) they are protected from opportunistic parasites and disease;
- (3) they are protected from predation by Golden Eagles;
- (4) they further refine specialized hunting skills that enhance survivability in the wild.
(Hunting is genetically keyed *and* a learned behavior, acquired over time.)

Clients who acquire falcons at the State auction will be provided strong financial incentives to return falcons to the I.R.M. in prime, healthy condition, six months after initial sales (September – October), or eight months after capture (August-September). By providing strong financial incentives for Arab buyers to return falcons in good condition, they are motivated to upgrade the quality of medical care, food, and management of captive falcons. The Return Incentive Program™ effectively turns the falcon auction into a *falcon rental* Program.

A far higher percentage of falcons removed from the wild, maintained in captivity during their first winter, survive to breeding age – relative to wild falcons. This percentage is significantly greater than juvenile falcons living in the wild, which typically experience a 70% mortality. Falconers protect their captive birds from mortality due to the eagle predation and disease that would have otherwise occurred in nature.

At the point of their return to I.R.M., and their release into nature by U.C.R., the rental falcons will have (a) been carried through their first, most difficult winter, (b) learned how to avoid eagle predation, (c) learned how to hunt, and (d) been protected from disease via proper medical care.

³³ In the black market, the Sheikh or Prince who sponsors criminal smugglers is forced to pay for virtually every falcon delivered, regardless of it's merit or value. This because the conspiratorial collaboration between the two parties requires the *buyers* need for high quality falcons is met, along with the *supplier's* need for inflated revenue – derived from artificially high prices, bribery to foreign officials, costs of courier jets, faux “conservation” programs – all as overhead costs for maintaining black market venues. Inflated payments from Arab Royalty, extorted by smugglers for low quality falcons, are acceptable to Arab buyers, *provided* there are at least a small number of exceptional, rare falcons in each consignment.



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Therefor in this Program, falcons returned to Mongolia for release into nature, possess skills equivalent of a “University education” (figuratively speaking) – developed while they safely mature to adulthood in captivity – thus avoiding high 70% young-of-the-year mortality rates that typically deplete wild, juvenile falcon populations.

“Rehabilitation & Release Program”

Rented falcons returned to I.R.M. will be transported back to producer countries, for a one month quarantine at the U.C.R. *Falcon Hospital and Research Center*. After rehabilitation they shall be released, or “hacked” back to nature.

Optimal habitat shall be chosen by trained Mongolian field students, who implement the release program supervised by the U.C.R. *Science Advisory Board*. Due to a rigid quarantine protocol, these falcons pose zero risk of avian disease transmission to wild stock ³⁴. Because of their health care and hunting skills developed during their winter in captivity, these falcons have a greater probability of survival, relative to juvenile, wild falcons of the year.

“Tribal Conspiracies”

Compel Mandatory & Independent Resource Controls:

Middle East smuggling conspiracies are characterized and implemented by alliances between tribal units. And, smuggling *partnerships* are typically dominated by one family tribal unit, associated with the Rule of one Country or Emirate:

- (1) *Abu Dhabi* smuggling is dominated by three al-Nahyan brothers known as the “Triad Sheikhs”: Crown Prince Sheikh Khalifa bin Zayed, Sheikh Hamdan bin Zayed, and Sheikh Mohammed bin Zayed ³⁵;
- (2) The *Dubai* “al-Maktoum” family dominates Dubai-based smuggling, all of which is under the purview of Sheikh Mohammed bin Rashid, Sheikh Hamdan bin Rashid, and Sheikh Maktoum bin Rashid al-Maktoum ³⁶;
- (3) *Saudi Arabian* smuggling is dominated by Prince Sultan bin Abdulaziz al-Saud, Prince Naif bin Abdulaziz, and constellations of Royal Princes and Diplomats –

³⁴ Mongolian *Minister of Nature* Tsohiogyn Adyasuren vigorously opposed the U.C.R. Program, claiming rental falcons could not return to Mongolia without risking transmission of Middle East avian diseases to Mongolian natal stock. If this were a valid complaint, U.S. Department of Agriculture Quarantine Stations would not exist, for the import of birds originating from Arabia. U.C.R. *Exhibits* demonstrate the Minister’s objection was hastily contrived to obstruct U.C.R.’s Project, rightly perceived as a grave threat to ongoing, GOM smuggling.

³⁵ **Sheikh Khalifa bin Zayed al-Nahyan** is the “Crown Prince of Abu Dhabi”, the “Deputy Supreme Commander of the U.A.E. Armed Forces” and the “Chairman of the Executive Council of Abu Dhabi”; **Sheikh Hamdan bin Zayed al-Nahyan** is the “Minister of State for Foreign Affairs”; **Lieutenant General Sheikh Mohammed bin Zayed** is “Chief of Staff of U.A.E. Armed Forces”, responsible for his closest friend, Mohammed al-Bowardi. The “Triad” are sons of the U.A.E. President.

³⁶ **Sheikh Maktoum bin Rashid** is the UAE Vice President and Prime Minister, and the Ruler of Dubai; **Sheikh Mohammed bin Rashid al-Maktoum** is “Minister of Defense” and “Crown Prince of Dubai”. **Sheikh Hamdan bin Rashid** is “Minister of Finance & Industry” and “Deputy Ruler of Dubai”;



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including the Saudi Ambassador to the U.S., Prince Bandar bin Sultan bin Abdulaziz – who smuggle falcons on behalf of Prince Sultan and Prince Naif ³⁷.

Saudi Nationals cannot smuggle falcons for U.A.E. Sheikhs without incurring the wrath of Prince Sultan or Prince Naif. Nationals from the United Arab Emirates cannot smuggle falcons to Saudi Arabia without risking lethal marginalization in the U.A.E. Opportunistic smugglers solve this challenge, by offering first choice of black market birds to their own tribal Ruler. Falcons their own tribal Sheikh rejects and does not buy, are re-exported without C.I.T.E.S. permits and sold across borders to Sheikhs and Princes representing other tribes and Countries.

For example: Mohammed al-Bowardi smuggles the best falcons to his Abu Dhabi “Triad Sheikhs”. After paying deference to his Sheikhs – those falcons which his Sheikhs reject and do not buy, are transported across international borders for sale in Saudi Arabia and Qatar. This is the way a professional sycophant curry’s favors and makes his living.

When a National is in poor standing with his Sheikh, or if he wants to play both sides of the fence – he hires an intermediary to deliver his falcons to market in foreign countries, so his identity isn’t associated with his sale to a tribe, to which he doesn’t owe allegiance.

Into this complex equation, European and Western biologists have interjected themselves, as implementing agents for cross-border Traffic – often functioning as opaque bridges between incompatible Tribes. In this capacity, Dr. Launay, Potapov, and Fox are indispensable to Arab smugglers.

It is no coincidence the U.A.E. were first named the “Trucial States”, retaining this name until 1971, in deference to a British Treaty signed to avert Maritime Piracy. Before the Emirates signed that Treaty imposed by the British, U.A.E. vessels very frequently attacked and scuttled Dutch, Portuguese, and British trading ships carrying Indian cargo. Sea-based Piracy was *the* primary source of foreign currency for the Gulf Sheikdoms, until the British Crown dominated the region, snuffing out Maritime Piracy forever. Incongruously, U.A.E. *wildlife Piracy* is now implemented by a British National, employed and directed by Mohammed al-Bowardi, a U.A.E. National.

A successful Gulf-based Pirate, delivering falcons to his tribal Sheikh or Prince, is indeed a celebrated figure. C.I.T.E.S. and the international conservation community need to appreciate this *culture of Piracy* – endemic to the U.A.E., Saudi Arabia, and the Gulf – in the context of history, in order to comprehend precisely why the U.A.E. and Saudi Arabia, in particular, adamantly refuse to cease black market trade in falcons.

Among falcon smugglers, there is honor in the cultural (tribal) phenomenon that can only

³⁷ **H.R.H. Prince Sultan bin Abdulaziz al-Saud** is the Saudi Arabian “Minister of Defense”, destined to become the future Saudi Arabian “Crown Prince”;

H.R.H. Prince Naif bin Abdulaziz al-Saud is the Saudi “Minister of Interior”.

Prince Bandar bin Sultan bin Abdulaziz al-Saud is the Saudi Ambassador to the United States. Prince Bandar broke the *Migratory Bird Treaty*, the *Lacey Act*, and C.I.T.E.S. when he smuggled falcons to his father Prince Sultan, and his uncle Prince Badr, by using Saudi Embassy agents and Diplomats to move birds from Alaska and Canada through Washington Dulles airport, en route to Saudi Arabia.



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be characterized as “Loyalty Among Pirates”. Unrelated Royal family (tribal) units are forced to share between themselves, Asian Officials and biologists who facilitate Traffic. Entire geographic regions in falcon supply Countries are proprietary to identified tribes who maintain exclusive regional access to contraband falcons and Houbara. Competing tribes generally concede to respecting territorial access to game, as proprietary to others.

However on occasion there are violations when, for example, Saudi Princes have removed Houbara in territories owned by the U.A.E., so that U.A.E. Sheikhs were unable to hunt, due to scarcity of game. i.e. Falcon supply Countries (Pakistan, Kazakhstan, Russia, et. al.) are comprised of provincial territories – each carved up into hunting & smuggling territories exclusively managed, controlled, and owned by distinct Middle East tribal units. Indeed, the Gulf-based Piracy of old has, once again, been exported abroad.

- ❖ Gulf-based tribal alliances conspire to provide funding, Official cover (including status of “Diplomatic” immunity), and logistical support to enable acts of wildlife Piracy. The role of this wildlife Mafia is counterproductive toward delivering to the Treasuries of falcon supply Countries, the full market value of resource sales (falcon rentals). It is essential for this market and falcon resource-protection to be implemented by an agency independent of tribal coalitions. In this regard, U.C.R. resolves today’s threats of Gulf-based smuggling, and the I.R.M. is capable of delivering to source and supply-Countries the full value of falcons – two of several purposes for which the Project is designed.

“International Wildlife Observers™” (I.W.O.) Offer Superior Management Controls:

All U.C.R., I.R.M., and Central Asian falcon Programs are to be monitored by International Wildlife Observers™ (I.W.O.). I.W.O. participants oversee all activities where Personnel come in contact with confiscated falcons – including research, medical, training, and rehabilitation procedures.

I.W.O. staff are selected from a variety of multinational backgrounds. Their sole purpose is to monitor and report on whether or not designated parties are responsibly looking after valuable falcons owned by the source Country, and to establish that Caretakers are not smuggling falcons.

I.W.O. staff operate with “Observer Status”, whereby they may be considered as neutral “human filing cabinets”, dedicated to monitoring field work, providing evidentiary and procedural certification for falcon handlers. I.W.O. reports cover each falcon’s care, from the point after confiscation, until their return and release in nature.

Due to their eclectic cultural backgrounds, their diverse Nationalities, and the idealism of youth – I.W.O. participants are less likely to collaborate in smuggling conspiracies, which are typically predicated upon agreements between compatible tribal cultures and corrupted Governments. *Cycling* of I.W.O. staff also helps to prevent development of *mature smuggling conspiracies*, another trademark of today’s Gulf-based smuggling teams.



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Enthusiastic interest has already been expressed by the “Peace Corps” to participate in I.W.O. work as an option available to Peace Corps staff members working abroad – conditional upon the Peace Corp’s expressed requirement their personnel not be present during (a) police law enforcement or “sting” operations, and (b) commercial activities.

Summary:

Fifty years ago, tribal falconry was “sustainable” due to its traditionally remote and isolated, seasonal and regionally limited impact on the environment. The most recent 10 years have witnessed “unsustainable” territorial expansion of Arab falconry, with its export into domestic falcon-producing populations and Countries of ex-Soviet Asia – through “conservation” and “research” programs engineered as a pretense for Government-sanctioned, tribal smuggling rings.

As illicit trade is implemented by Officials representing both supply *and* consumer Countries, Traffic is today characterized as *Government-to-Government* trade that violates the United Nations C.I.T.E.S. and Biodiversity Conventions.

U.C.R. Personnel have, during ten years, conducted intensive threat-based assessments vis-à-vis Middle East falconry and its relationship to Asian falcon populations. Vulnerability analysis demonstrates that only a “high-initiative” Program will succeed in defending endangered falcons, and modifying Middle East falconry threats. The U.C.R. Program is tailored to target and resolve these threats forever, and to also compel the genuine, transparent environmental reforms that are necessary to *Save The Falcons*™ ³⁸.

END

³⁸ Save the Falcons™, Resource Reward Program™, Nest Site Construction & Enhancement Program™, Return Incentive Program™, International Wildlife Observers™, and the Raptor Management Group™ are trademarks of the Union for the Conservation of Raptors, Inc. and International Raptor Management, Inc. Visit www.SaveTheFalcons.org