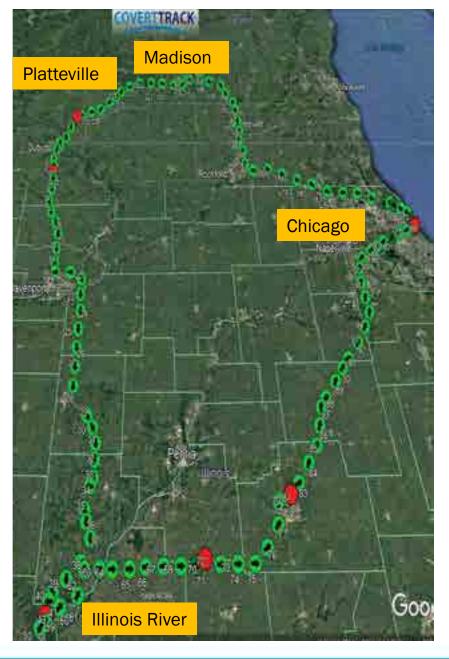
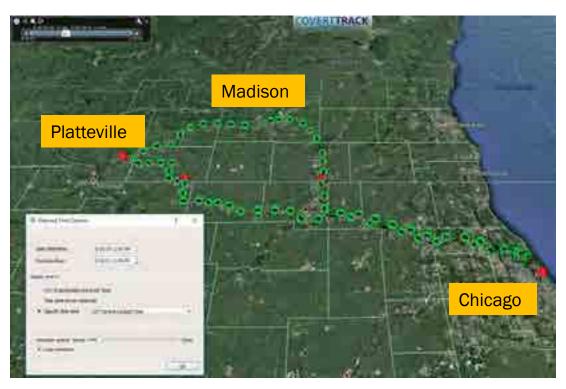
GPS Trackers on Li's Vans

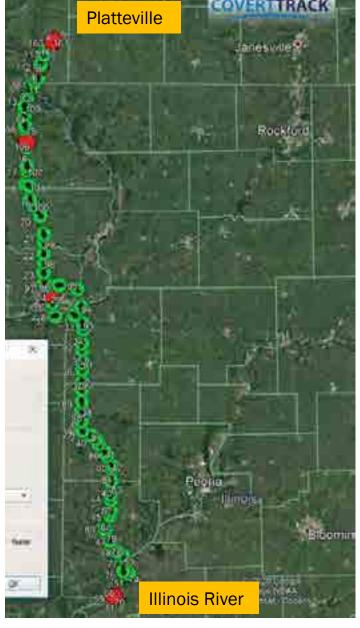
Route #1: Platteville, WI → picked up 2,000+ pounds invasive carp and other fish from Illinois River commercial fishers → delivered to Chicago, IL and Madison, WI





Route #2: Platteville, WI → picked up 2,000+ pounds invasive carp and other fish from Illinois River commercial fishers → Returned to Platteville, WI for overnight → Delivered to Chicago, IL / Madison, WI



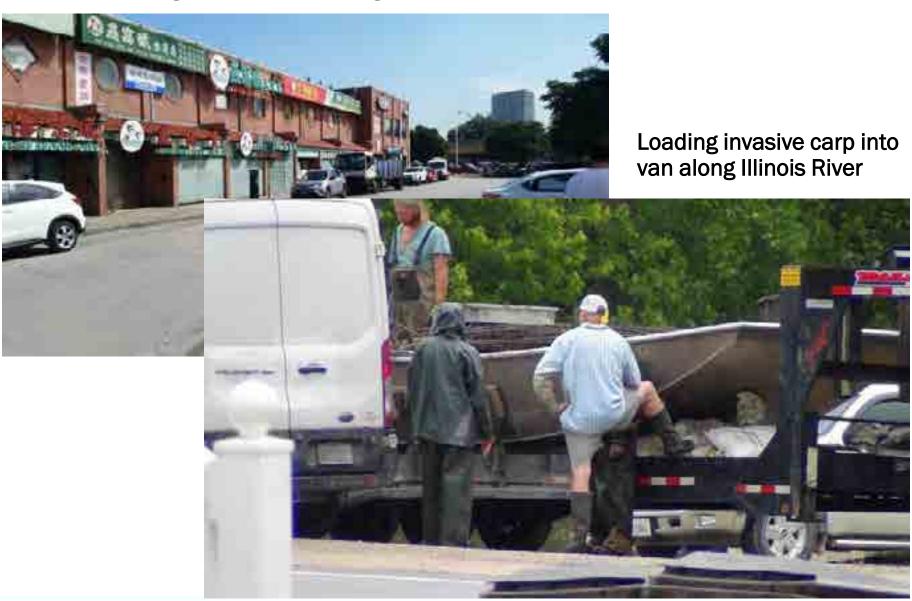


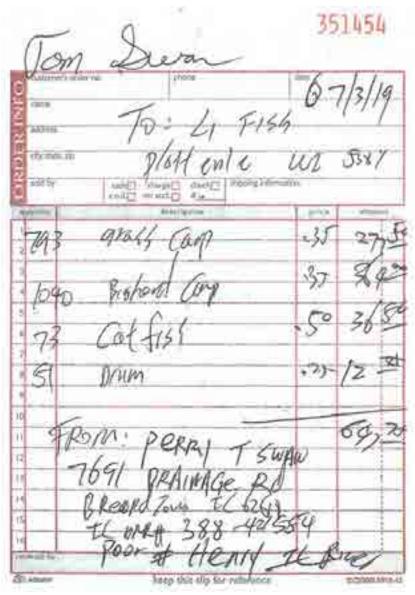
- April 19, 2019 phone call from Mr. Chow "The fish are here."
- Checked GPS tracker which showed Ping Li's refrigerated van at the store at that very moment. Served as continued corroboration.





Making deliveries in Chicago





July 3, 2019 Stop at Asian Midway Foods

- Had 13 bighead and grass carp he was delivering
- Had receipt showing purchase from Illinois commercial fisherman
- On that day alone, missing records for over 1,030 lb. invasive carp he had purchased earlier in the day . . . Where did the fish go?



October 2019 Search Warrant

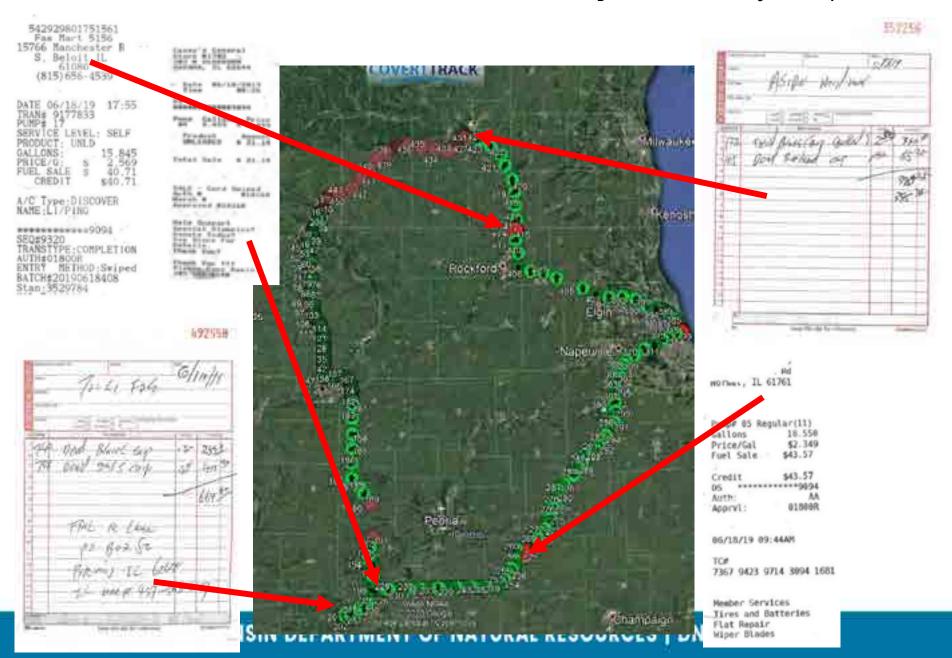
- Li's home/business
- "At sick father in New York."
- Called Li's phone. Came outside within 10 minutes.
- Lots of talking (even after call to lawyer)
- Buys/sells 2,500 lb. per week
- Explained he gave some records to lawyer after July contact but had copies there
- Didn't admit to stocking invasive carp
- Lots of records (and notes)
- Recorded interview fluent English
- Seized records and phone
 - Invoices
 - Receipts for gas stations along travel route
 - Texts and images on phone



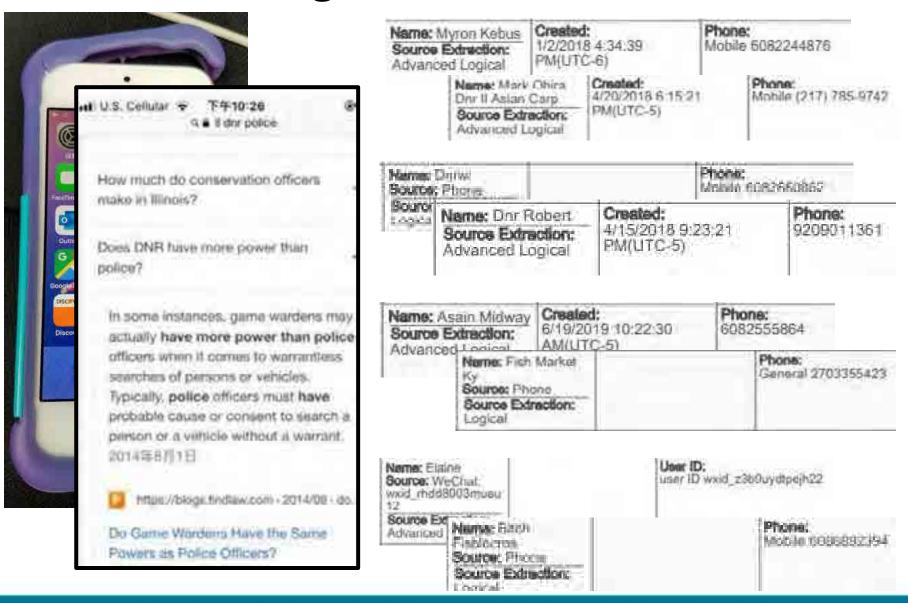
Surveillance Camera Image from Asian Midway Foods and Provided to Ping Li



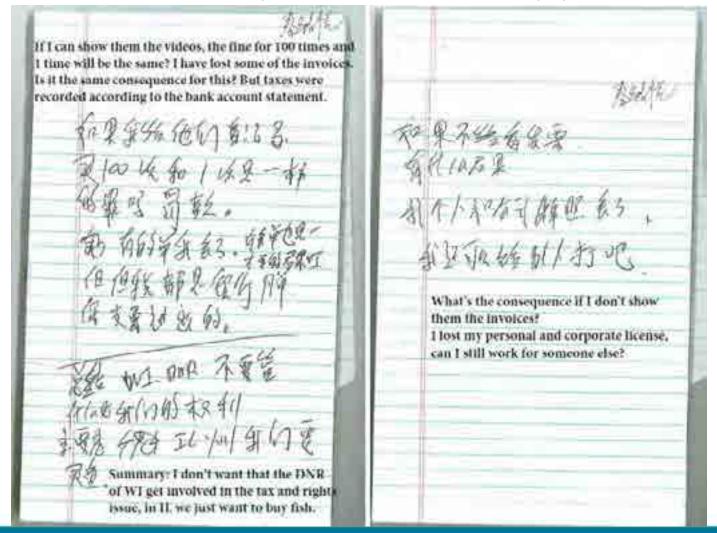
Connections and Corroboration – June 18, 2019 (just one of many dates)



Processing of Smart Phone from Warrant



- Written notes in Mandarin Chinese . . . Too many!
- DNR paid translation service
- Defendant concerned about taxes (cash business)
- Defendant asks about consequence if he does not show paperwork to DNR



Forensic Auditing of Records

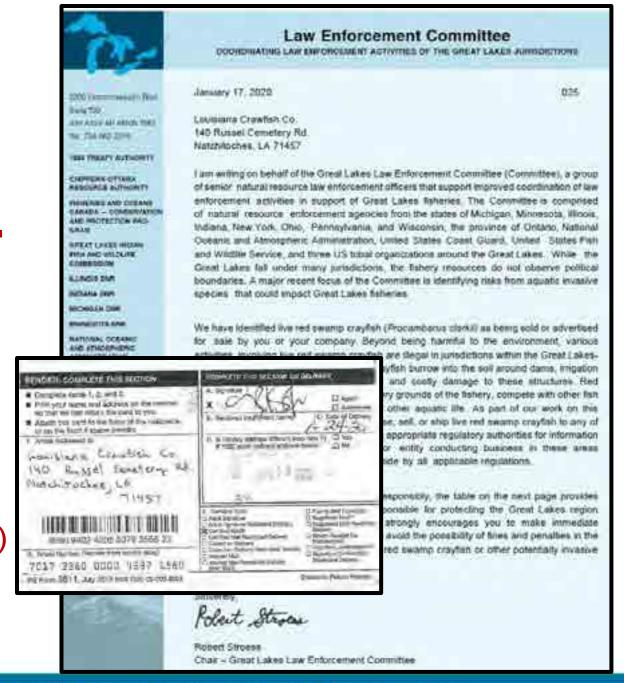
- Sales to Asian Midway Foods
 - 2018 . . . 6,493 pounds for \$12,551
 - 1st half of 2019 . . . 3,248 pounds for \$6,746
- •98,000 pounds bought per year
- 48 trips bringing these into Wisconsin
- Many hundreds of records missing information
- •Underreported income by \$55,000 per year (tax analysis vs. purchase/sale records)
- •28,000 lb. invasive carp missing per year

- Defense concerns:
 - Didn't know law (countered by historic contacts, industry connections, knowledge of other laws and regulatory programs, etc.)
 - Didn't speak English well; actually had court pay for interpreter for all hearings (countered by recording of fluent English)
- Charged with 8 crimes, 14 citations
 - Illegal Transport of Invasive Carp (intact)
 - Unmarked Wholesale Fish Dealer Vehicle
 - Possessing Illegal Fish Over \$300
 - Fail to Keep/Maintain Records
 - Convicted of 19 charges
 - Penalties ~ \$13,500



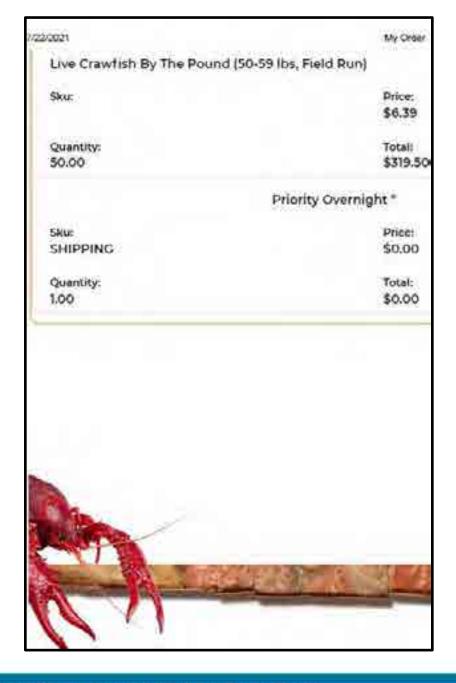
Case Study: Louisiana Crawfish Co. Live Red Swamp Crayfish **Shipments**

(Industry: Invasive Species as Live Food)









... Louisiana Crawfish Co. (continued) ...

Live Crawfish Packages Shipped by Louisiana Crawfish Company to J & P Fresh Market

Date Ordered	Crawfish Weight (lb.)	Delivery Company	Delivery Date
05/07/20	40	FedEx	05/08/20
05/14/20	40	FedEx	05/15/20
05/21/20	40	FedEx	05/22/20
06/04/20	30	UPS	06/05/20
06/11/20	30	UPS	06/12/20
07/01/20	40	FedEx	07/02/20
07/02/20	20	UPS	07/03/20
07/08/20	40	FedEx	07/09/20
07/15/20	40	UPS	07/21/20
03/03/21	50	FedEx	03/05/21
03/10/21 (package	e 1) Part of 80	UPS	03/12/21
03/10/21 (package	e 2) Part of 80	UPS	03/12/21
03/17/21	40	UPS	03/19/21

... Louisiana Crawfish Co. (continued) ...



Thank you for your help. Have a nice day!

From: Wakeman, Robert S - DNR < Robert. Wakeman@wisconsin.gov>

Sent: Monday, March 9, 2020 12:46 PM

To: avery@lacrawfish.com

Subject: RE: Aquatic Invasive Species

Red Swamp Crayfish are prohibited to be shipped live into Wisconsin. If they are frozen or otherwise "not alive" you could still ship to Wisconsin.

Hone that helps

From: avery@lacrawlish.com <avery@lacrawlish.com>

Sent: Monday, March 9, 2020 11:00 AM

Bo To: avery@lacs wwtich.com

Subject: Aquatic invasive Species

Good morning.

We received communication from the Great Lakes Committee regarding the red swamp crawfish. Can you please provide specific regulations for your state? Thank you

Avery Smith Louisiana Crawfish Company



... Louisiana Crawfish Co. (continued) ...

Unfortunately, we are unable to ship LIVE Crawfish to HAWAII, WASHINGTON, MICHIGAN, ILLINOIS, WISCONSIN, PENNSYLVANIA, MINNESOTA, IDAHO or OREGON due to restrictions by the Department of Natural Resources

- Oregon, you may obtain a permit for Live Crawfish from Rick Boatner at (503)947-6300.
- Idaho, you may obtain a permit for Live Crawfish from Bethany Gaddis at (208)332-8626.
- Minnesota, if you are a restaurant you may obtain a permit for Boiled Crawfish from Chelsey Blanke at (651) 259-5350.

Wisconsin Restrictions on LA Crawfish Website

- Not listed prior to GLFC-LE Committee outreach letter (which was sent in January 2020)
- But then listed as of April, May, and July 2020 (per Wayback Machine <u>www.archive.org</u>)

Contacted LA Crawfish

- Called to LA Crawfish and Spoke with Avery Smith
 - Agreed to send customer delivery information . . . but then company didn't follow through
 - Rec'd letter and updated website
 - We no longer ship live crayfish to WI
 - We only ship RSC, no other species
 - We spot check orders . . . **Give me the addresses where we're shipping**
- Didn't send us customer information, so . . .
 - Follow-up call . . . Talk to my dad from now on . . . David McGraw
 - David McGraw said:
 - I looked it up online and you've already had RSC since the 1960's (FALSE)
 - What is the penalty if we continue to ship them?
 - Create a permit system like Idaho and Oregon



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV



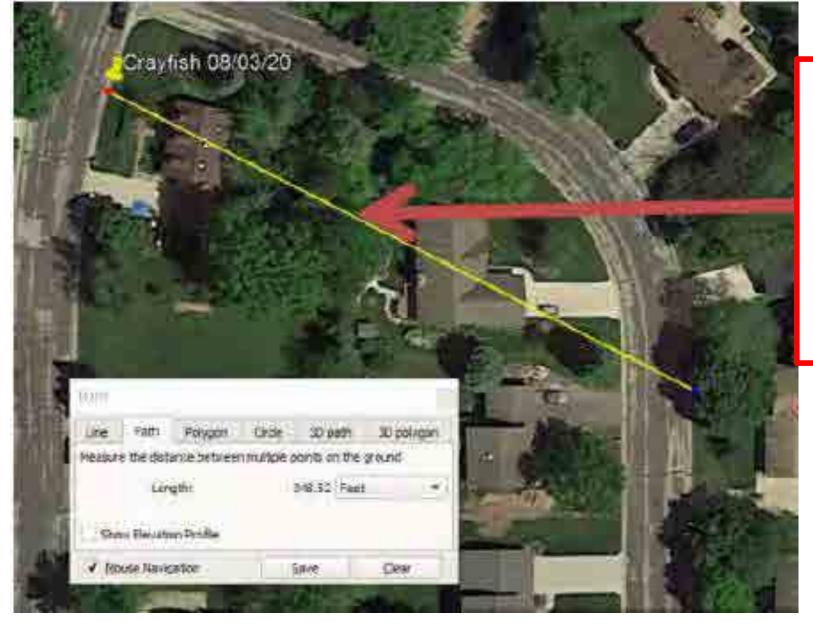


Escapee on the Run...or Crawl

- Citizen reported RSC on neighborhood street in Fredonia, WI
- Exact location unknown (just a nearby intersection)
- Walked the neighborhood to find matching pavement . . . Found the spot.
- Canvass . . . Proximity to ponds . . . Etc.







348 feet from crayfish boil house delivery to escapee

Customer to LA Crawfish Phone Operator:

I saw on your website that you can't ship to Wisconsin.

LA Crawfish Phone Operator to Customer:

Wisconsin doesn't have a law about the crayfish and is still working on legislation to prohibit their shipment to Wisconsin.





- 16 shipments
- 12,816 red swamp crayfish
- 15 criminal charges
 - 10 <u>criminal</u> convictions (not citations/tickets)
 - 5 dismissed
 - \$34,380 penalty
 - 1st <u>criminal</u> convictions under this law (13 year old law)



Forensic Auditing of Records

- How do you catch someone with 10,000 or 200,000 pounds of illegal or unreported fish? . . . RECORDS!!!
- Totally underutilized!
- Actually simple . . . Just takes attention to detail, data entry, and dedicated time.
- Field contacts can NEVER come close to results from forensic auditing!

- Examples in past 10 years:
 - Lake Superior
 - Case #1 178,000 lb. whitefish
 - Case #2 13,500 lb. lake trout
 - Case #3 20,000+ lb. whitefish/lake trout combined
 - Mississippi River Commercial Fisher/Wholesale Fish Dealer Case
 - 2,899 lb. shovelnose sturgeon
 - 19,714 lb. catfish
 - 24,320 lb. buffalo
 - Wholesale Fish Dealers
 - Case #1 28,000 lb. invasive carp
 - Case #2 240,080 lb. whitefish, lake trout, and yellow perch

-eigentment of Natural Resources dry wigov Read all instructions on the back of this form before filling out. A separate inventory report form is required to be (Addings: No.

Great Lakes Fish and Sturgeon Commercial Fisher / Wholesale Fish Deally Inventory Report

Farm 4100-117 (R 10/16)

License You are Reporting Under: (Check Of Great Lakes Commercial Fisher – License Wholesale Fish Dealer – License # WH Shovelnose Sturgeon Permit #	Taken: I Any Catch and Transactions for the De NJ Catch and Transactions for the De	
Inventory Type: (Check One) If initial O Initial	inventory, you must enter the month and en future annual inventories will be completed.	Month Day
Rusiness or Storage Facility Where Fish are No. City SVALID (TUS/CLV)	Address State L) L	20 con 53081
Species Enter the name of each Great Lakes or sturgeon species under your control or in your possession. Use only these names:	Condition Enter the appropriate condition for each species lists if not listed here, write in a description of the condition	Weight and Unit of Measure
Alexife Shovelnose Sturgeon Burbot Siscowet Chubs Smelt Lake Herring Whitefish Lake Trout Yellow Perch Menominee	1 - Round B - Chunked'Insch 2 - Dressed/Iresh 9 - Chunked'Irozen 3 - Dressed/Irozen 10 - Chunked'smoke 4 - Dressed'smoked 11 - Snippedfiresh 5 - Fillet/Irozen 12 - Enippedfiresen 6 - Fillet/Irozen 13 - Eggs & Outs 7 - Fillet/smoked 15 - Eggs/Lmfinished 15 - Eggs/Inished	the appropriate unit of measure (ibs or kgs).
Lake Herring	43.66	(265) (bi) Kg 900 (bi) Kg 55 (bi) Kg 577 (bi) Kg 777 (bi) Kg
Smeth	3	SSI (Lbs.) Kg SSI (Lbs.) Kg S(72) (Lbs.) Kg Lbs. Kg Lbs. Kg

(Printed Name of Person Signing) "(Signature of Licensee)

If license is issued in the name of the business, signature must be person-duty authorized to submit this on behalf of the licensed.



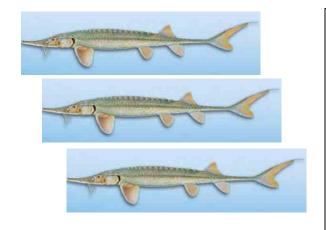


Cash in account on Jan. 1

+ deposits

- payments

Cash remaining on Dec. 31



Fish in storage on Jan. 1

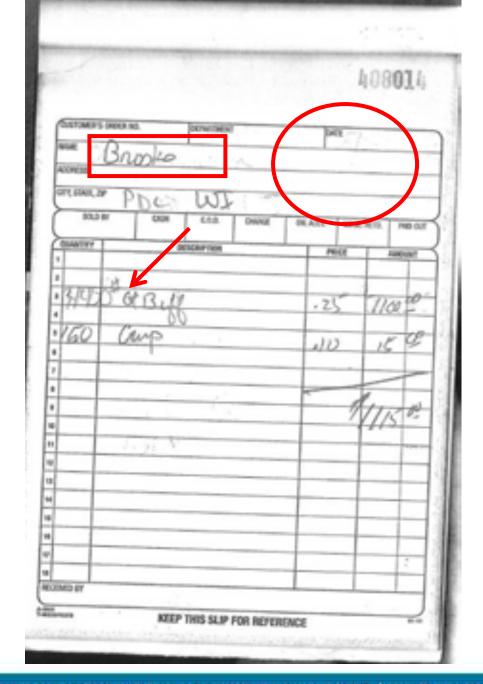
+ fish caught

+ fish purchased

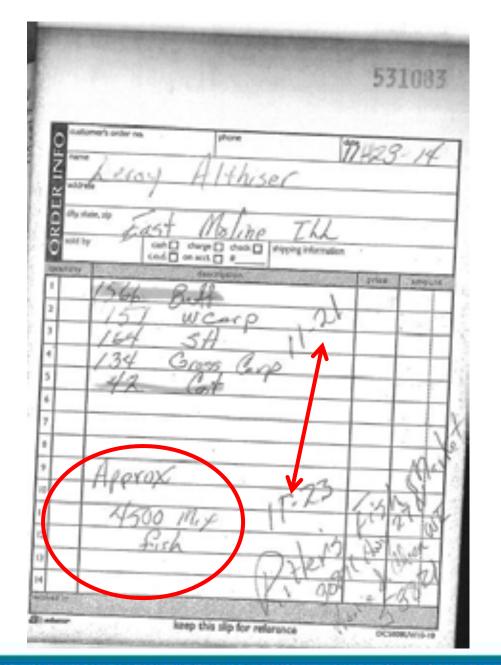
- fish sold

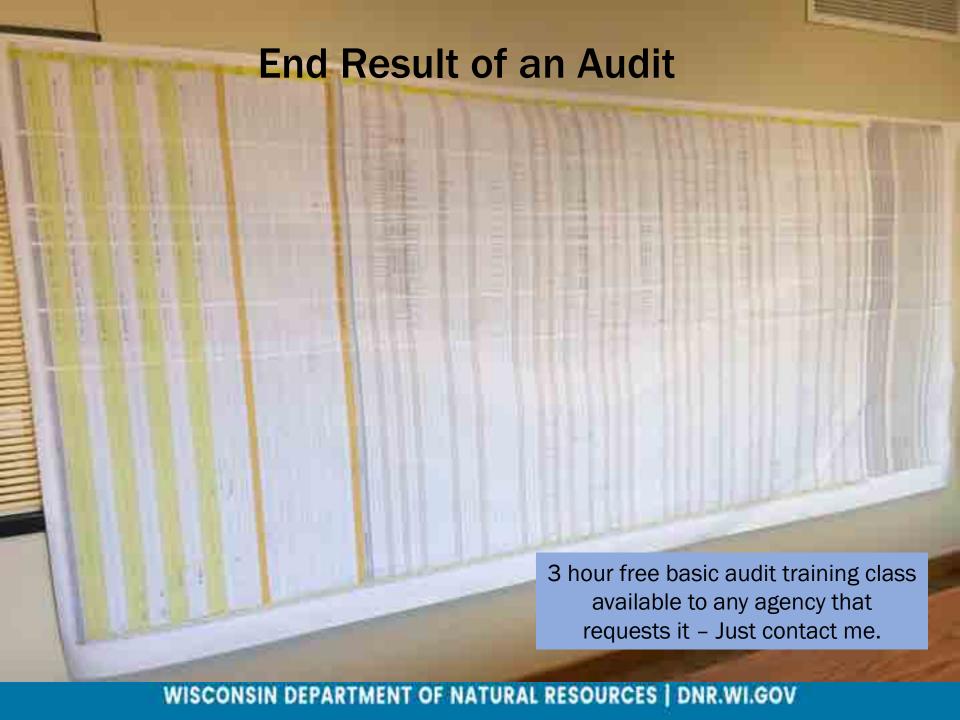
Fish in storage on Dec. 31

J & M Fisheries LLC 12695 Hwy. 42 Ellison Bay, WI 54210 8880 (920) 854-2428 or 854-4335 Jeff Weborg Whsl #25_ Name Address City/State/Zip PRICE QUANTITY DESCRIPTION AMOUNT Received by,



					6552	else.
						_
CUSTOMER'S ORDER NO.	DEPARTMENT		DATE	(NC)	-29-	15
IAME 1	Dolono	AL	1	0	í.	*
ADDRESS	LANDYS	· ·	-+: 0	1,91		
CITY, STATE, ZIP				17.00		
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	programmion		I PF	HCE	DOMA	NT
QUANTITY	DESCRIPTION				A	A
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AIS-Organisms in Trade Law Enforcement Work Group

- Grant funding through partnership with DNR's invasive species program staff
 - Funds 1 FTE (from existing staff)
 - 4 field wardens x 1 month
 - 2 investigators x 3 months
 - 1 lieutenant x 2 months
 - Specialized training for awareness of industries
 - Focus effort on aquatic species in trade (not just AIS)
 - Serve as another resource for field wardens
- Inefficient if funds spread amongst 250 officers****
 - Work group has more than a <u>basic</u> understanding
 - Observations more immediately lead to connections
 - e.g. Traffic officer can't be responsible for multi-state narcotics task force
- Has resulted in hundreds of inspections, self-generated cases, and 200+ convictions in 3 years

Cheat Sheets

- Wholesale Fish Dealer Vehicles
- Wholesale Fish Dealer Buildings
- Pet Stores Invasives
- Specialty/Ethnic Grocery Stores -Invasives
- Live Rough Fish Haulers

Aquestic Organisms in Trade - SPECIALTY/ETHNIC OROCERY STORES - Enforcement Reference Sheet

Summary: In general, specialty/ethnic grocery stores have no DNR intensing and get products from wholesalers lift the wholesaler sell species of Rsh Hill are found in Wit then the wholesaler must be licensed under a Wi Wholesaler Fifth Dealer (WFD) License. The most likely violations you may encounter are possession of invasive line fish/craylish, possession of dead Agian carp that have not been eviscarated or had the gills removed, utiling wild-saught game fish, and identifying an unlicensed WrD supplying the store. The stores can sell full species found in the wild in WI but can't sell sport-caught gamelish. The fish of species found in the wild in WI - must be from a communicial fillner, but fam.
WFD, thisped to the store through a shipping company like UPS or FedEx, or the store must have taken physical purpossion of the fish outside of WI and brought back to WI.

impection authority; in general no impection authority masts at operaty/etime, grovery stores. But if the luminose is a Wi WFD their DNR has inspection authority (buildings/records/equipment/enticles) relative to enforcing the WFD mass (see s. 35 503(6) Wis. Stats). Such inspection authority also extends to businesses which are NOT (icensed but still meet the definition of a WFD. For specialty/ethnic grovery stores you will generally rely on condent and plain sight for any searches.

Erimory statutes/codes applicable to this business . and plain language summary

- Section NR 19.05(4) Wis. Adm. Code Asian Carp Processing
 - Asian carp may not be transported over land within or through Will unless exporated on the gifts plate as completely severed.
 - "Assert satts" defined as leighe all frank, gross, and allow our our any other care success other than common care, goldten, and for
- Section NR 40.04 Wis. Adm. Code Prohibited Invasive Species
 - Cannot possess, transport, or transfer "LIVE" "prohibited" invasive species
 - Aimost any crayfoli you encounter will be probabled. Non-recive crayfish are illegal.
 - Wit making crawfish DK (unidely in limp stories) (David (Commons diagnos), Casar (Dryangers), or formula processor (Commons process), Virtie (Crossesses processes proces
 - In the food industry, \$9.9% of chayfish are prohibited field awarm) (Procombanus clarket).
 Other prohibited fish include analytical (Chawfilde species), Actan curp, and Eander (Sander lucroperca) which looks like a walleye. Nannative freshwater fish are prohibited maccol for several defined exercitions (see NR 40 04(2)(r) 12 a fluorage e).
- Section 29,503 Wis. Stats. Wholesale Fish Dealers Includes Decising requirements, records requirements, which marking requirements, and inspection authorities.
- Section 29 559 Wis. Stats. Cale of Wild Animals likely use only for selling of sport-caught trib

Common species you may find that are NOT NLEGAL because of various legal exemptions:





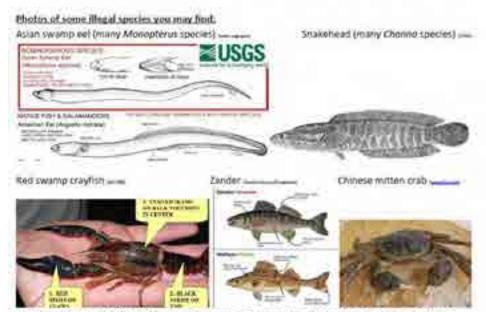


Enforcement strategies:

- Visit the store in plain clothes; just like a normal customer.
- Visit mant/sanfood counter, arrated tanks, francers. Arrated tanks may be incorrectly labeled.
- Don't' worry about saltwater species . . . they are unregulated by DNR.
- Look for crayfish, mittlen crabs, makehead, and Asian swamp eals as live investive species.
- Asian carp must be eviscerated or gilled (even if frozen). Revivable 24+ hours. If store has fresh
 chunks/fillets/heads they may be receiving them whole/intact (violation) and processing them.
- Look for native fish to indicate sale of wild fish. Are these sport-caught? If not, who is the WFD?
- Come back in uniterm (either you or someone else) to deal with any enforcement issues.
- Get delivery invoices/receipts for illegal species. Ask now the products arrive (UPS, FedEx, delivered by supplier vehicle, picked up by store staff, etc.). May also be listed on invoice.
- Photocopy, photograph, or seize the records. Photograph and seize invisivé species.

Make sure to document this information (may wish to use attached notes sheet):

- Name and address of story (outside signage AND licenses/permits posted with legal name listed)
- Company vehicles AND vehicles making deliveries to the company while you're there
 - side markings (often several business names store name "Operated by . . ." name)
 - Is it a refrigerated vehicle or not? Helps to determine contents.
- General product categories (live freshwater fish, ocean fish, live/dead crayfish, live crabs, etc.)
- Specific invasive species or game fish offered for sale, including signs and product labels



December 2021 by Lt. Robert Stroess - Commercial Fish and Aquatic Species in Trade Administrator

Notes from SPECIALTY/ETHNIC GROCERY STORE Enforcement Visit

Date: Time Arrived:	Time Left:			
Warden Name:		arden Attire: Plair	Clothes OR	Uniform
Business Address:	Oty	County		Zips
Business Name (signage on outside):				
Business Name (on posted licenses/permit	ts/recards inside	0		
Types of tanks observed (such as aquarrun	ns with water, as	ration, built-in pe	ots, etc. ji	
Categories of unimul	s offered for sale	(circle mose that	apply):	
Freshwater Fish - Live / Frozen / Not froz	(en	Crayfish - Live / Frozen		
Ocean fish Turtles - Dive / Dead	Live crabs	Uve mussels		
Mystive Species Observed: NO = Y Name of invative Species	ES Phys	ically Observed	Sign or Label for Si	
#1:			-	
82.				
#3:				
Fish Species Native to WFObserved: NO Name of Fish Species	-YES Phy	scally Observed	Sign or Label Sor Si	
#1	_			
#2:				
#3:				
Photographs: ✓ Business' vehicles:				
 Vehicles making deliveries to this 	business:			
✓ Species of interest for sale:	49000000			
✓ Other:				
information from employees:				
nvoices, receipts, records observed/photo	ographed/wued			

Specimens purchased of otherwise seized as evidence:

