

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 11-20808-CR-SCOLA

UNITED STATES OF AMERICA

v.

ENRIQUE GOMEZ DE MOLINA,

Defendant.

JOINT FACTUAL STATEMENT

The undersigned parties agree that the allegations contained in paragraphs 1 and 2 of the instant Information are a correct and accurate statement of the applicable federal laws and regulations in this matter.

The undersigned parties further agree that were this matter to proceed to trial, the United States, by witness testimony, documentary evidence, and photographic materials would prove the following:

IMPORTED SHIPMENTS THAT WERE INTERCEPTED

1. On or about September 24, 2009 and December 1, 2009, the United States Fish and Wildlife Service (USFWS) inspected two packages with undeclared wildlife in New York that were being sent from Indonesia to Miami, Florida via U.S. mail. The first package, with tracking number EE1315047571D, was addressed to Enrique Gomez, 6756 NE 4th Avenue, Miami, Florida 33138. Upon inspection of the first package's contents, USFWS Wildlife Inspector (WI) Tennis submitted the carcasses for identification to the National Fish and

Wildlife Forensic Laboratory (NFWL). On December 2, 2009, the NFWL completed its morphology report identifying the contents of this package as:

one (1) skin of a Java kingfisher (*Halcyon cyanoventris*), one (1) skin of a collared kingfisher (*Todiramphus chloris*), one (1) mounted lesser bird of paradise (*Paradisaea minor*), one (1) skin of an unspecified juvenile hawk-eagle (*Spizaetus* sp.), one (1) carcass remnant of a slow loris (*Nycticebus coucang*), and one (1) carcass remnant of a lesser mouse deer (*Tragulus javanicus*).

The hawk-eagle and the bird of paradise are listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and the slow loris is listed in Appendix I of CITES. The mouse deer is protected by Indonesian law, which requires a Republic of Indonesia Directorate General of Forest Protection and Nature Conservation permit when exported. This wildlife shipment did not include a CITES permit, nor was it accompanied by the required wildlife declaration form.

2. The second package, with tracking number EE128770240ID, was inspected on December 1, 2009. It was addressed to Troy Abbott – Henry Gomez, 20 Island Avenue, Apartment 806, Miami Beach, Florida 33130, and contained undeclared wildlife specimens or carcasses. According to NFWL Supervisory Forensic Scientist Bonnie Yates's preliminary identification of the mammal and WI Tennis's observations of the birds, this second parcel contained:

one (1) slow loris (*Nycticebus coucang*), one (1) hawk eagle (*Spizaetus* sp.), and one (1) giant squirrel (*Ratufa* sp.).

The giant squirrel is listed as CITES Appendix II wildlife.

3. Official records maintained through June 2011 by the USFWS reflect no valid USFWS import/export license issued to Gomez, Troy Abbott nor anyone else associated with the two shipments as required by law to introduce wildlife into the United States for commercial

purposes. In addition, USFWS records do not reflect that anyone ever filed a completed Declaration for Importation or Exportation of Fish and Wildlife (Form 3-177), signed by the importer or the importer's agent. In fact, for each of the shipments identified hereafter, neither Gomez nor his agents applied for, filed, or completed any CITES documentation or Declaration for Importation forms.

FORFEITURE PROCEEDINGS & ABANDONMENT

4. On February 11, 2010, USFWS initiated forfeiture proceedings for the wildlife in the two shipments intercepted and inspected in New York and sent, via certified mail, a Notice of Seizure and Proposed Forfeiture that was received on February 22, 2010. On April 6, 2010, USFWS issued a Declaration of Forfeiture for the property after not receiving any response. On May 15, 2010, Gomez signed the abandonment form mailed to him for the mammals and birds contained in the September 24, 2009 and December 1, 2009 shipments from Indonesia.

5. On or about June 11, 2010, the USFWS inspected another package with undeclared wildlife from Indonesia, bearing tracking number EE1299093251D, addressed to Estetica & Design, Att: Henry, 6756 N.E 4 Ave., Miami, Florida 33138. Following inspection of the package's contents, USFWS WI Tennis determined the package to contain the following:

one (1) hawk eagle (*Spizaetus* sp.), one (1) Sunda pangolin (*Manis javanica*) and two (2) unidentified heron species.

No CITES permits or wildlife declaration forms accompanied the shipment. The package was labeled as "handicraft" with a declared value of six (6) dollars. This shipment, like the two previously intercepted in New York, contained a hand written Indonesian Sanitary Certificate of Animal Products for Non Consumption. This hand written permit contained the same document identification number as the earlier two. USFWS WI Bessey and USFWS SA Chapelle marked

the birds in the shipment with ultraviolet ink and injected AVID transponder tag number 048362844 into the pangolin. The shipment was then released and delivered to Enrique Gomez on June 17, 2010. On February 17, 2011, during a search of Gomez's residence and studio, the USFWS recovered, among other things, one (1) Sunda pangolin (*Manis javanica*) that contained the AVID tag number 048362844.

OTHER IMPORTED SHIPMENTS

Indonesia

6. According to PayPal payment confirmations, sent to Gomez's e-mail account, he directed at least eleven (11) payments to an Indonesian-based supplier in 2010. From May 2010 through June 2010, Gomez made several payments to this shipper totaling approximately \$800 for various wildlife, including wreathed hornbills, a cobra, and muntjac skulls.

7. USFWS seized a PayPal invoice during the February 17, 2011 search that indicated a purchase of an undeclared wreathed hornbill (*Rhyticeros undulatus*) skull from Indonesia on June 29, 2010. The wreathed hornbill is listed on Appendix II of CITES.

8. On August 4, 2010, regarding a shipment of wildlife, Gomez stated to his Indonesian-based supplier that:

today i received the package you sent. but the 3 small birds were no good...I think you need to send them with the body so I can skin them. all so with the solution you inject then with (not salt).

9. According to e-mails and USFWS records, on or about August 31, 2010, Gomez imported from Bali, Indonesia, among other wildlife, a babirusa (*Babyrousa babyrussa*) skull, orangutan (*Pongo pygmaeus*) skulls, and four (4) helmeted hornbill skulls without declaring them or acquiring required CITES permits. These species are listed on Appendix I of CITES and on the Endangered Species Act (ESA). Photographs of mammal skulls attached to e-mails

from the shipper match skulls seized from Gomez in February 2011 by USFWS. In August 2010, Gomez sent e-mails to his Indonesian-based shipper, in which he variously directed:

. . .i like to change my order take out the saw fish bill i think it may be to large i like to kip the package in the small size because costumes [Customs] is checking here i lost 2 package from china from my trip. i think they did not put carbon paper on the skulls. all so I like to get a orangutan skull. . . [August 20th]

* * * *

i just sent you the money today (citibank reference number 2370412931) sent to your bank...send me new photos of the 4 helmeted hornbill skulls the 7 babirusa skulls an 6 orangutan skulls so I can pick the ones i want... [August 25th]

* * * *

here is were to ship (Estetica design att. henry 6756 n. e. 4 ave. miami florida 33138 u. s. a.) please do not put my name on the package. All so if you can pack it like you did the other one you sent me. with the skulls raped in carbon paper. an the box with the cloth an fragile glass on it that was great. yes please send me a photo be fore you ship specially the babirusa skull an the orangutan skull...[August 29].

On November 1, 2010, Gomez wrote, "I got all the items you sent me today thank you so much fantastic."

10. On September 22, 2010, Gomez received an e-mail from his supplier in Indonesia stating:

Hello Enrique I've just sent the items, they are: #4 BOP's, #2 wild cats, # Asian Fairy blue bird, #1 Silver eared mesia and here is the tracking number: EE1299070321D (posindonesia.co.id).

The U.S. Postal Service (USPS) and USFWS records reflect that on September 27, 2010, Gomez received a package from Jakarta, Indonesia, tracking number EE1299070321D, that contained the undeclared wildlife.

11. On or about October 2, 2010, Gomez received a package of deer skulls from Bali, Indonesia, according to numerous e-mails between Gomez and the shipper regarding the

purchase of two muntjac skulls and his payment through PayPal of \$240.

12. In an e-mail to the supplier in Indonesia on January 12, 2011, Gomez wrote:

about th hornbill i hate to say yes because it looks so young an some ones pet. no i don't want you to kill it for me. an I have one of this kind you send me. I now they are hard to find may be the female of this kind or rhino hornbill or older bird . . . let me know thank you enrique.

13. On January 22, 2011, Gomez sent a payment of \$400 through PayPal to the same supplier and wrote an e-mail from account egm513@hotmail.com, saying:

I just sent you the money. you can send me the bop with the cobra & stork remember torap in carbon paper thank you enrique.

The shipper responded with a photograph of a live wooly stork and a cobra, and in a separate e-mail stated:

I've just sent the items, they are 3 BOP, stork and king cobra. And here is the tracking number EE1352051661D (posindonesia.co.id).

According to USPS records, on February 4, 2011, Gomez received the package from Jakarta, Indonesia, tracking number EE1352051661D, at his place of work, 6756 NE 4th Avenue, Miami, Florida. According to e-mails, PayPal payments, and USFWS records, the package contained undeclared wildlife: three (3) birds of paradise; one (1) king cobra (*Ophiophagus hannah*); and one (1) wooly stork (*Ciconia episcopus*). The king cobra is listed on CITES Appendix II.

14. According to e-mail communications and USFWS records, in February 2011, Gomez ordered and received additional muntjack deer skulls from Bali, Indonesia, without declaring them or acquiring required permits.

Thailand

15. On April 27, 2010, Gomez signed delivery for one (1) package from Thailand to the United States with tracking number EE055287590TH. According to e-mail communications,

PayPal receipts, and USFWS records, this package contained undeclared beetle (*Sternocera aeq*) elytra. On April 23, 2010, the shipper sent Gomez an e-mail with the above tracking number for the package. On April 28, 2010, Gomez wrote:

hi herbkerb just got the beetle wing they look great thank you so much. the last bag you sent me had the under side of this beetle do you have any more of the belly or tail. all so in October when you harvest them let me know.

From January through February, 2010, Gomez made payments through PayPal totaling \$890 to the same shipper.

16. According to available records, on December 13, 2010, Gomez made a payment to the same supplier, mentioned above, in Thailand, through PayPal, for \$3,800. On December 24, 2010, the shipper sent an e-mail to Gomez providing him with two tracking numbers, EE077532178TH and EE077532164TH, for an impending shipment. Gomez had previously provided his apartment mailing address, as well as inquiring by e-mail about what "other color jewel beetle" the shipper could obtain. The shipper responded to Gomez's request, asking what he meant by:

large quantities? . . . like 100k specimens , . . . the ONLY species of beetle readily available in really LARGE quantity . . . is same Green Jewel beetle *Sternocera aeq.*, as the elytra you've ordered - for this exact beetle. . . . Other beetles are not available in large quantities as this one [*Stenocera*].

According to USPS, on January 3, 2011, Gomez signed and accepted delivery of two (2) packages, tracking numbers EE077532178TH and EE077532164TH, sent from Thailand to the United States. According to e-mail communications between Gomez and the shipper, and USFWS records, the package contained undeclared beetle (*Sternocera aeq*) elytra.

Philippines

17. On June 16 and September 8, 2010, a supplier in the Philippines e-mailed

Gomez:

Hello Sir they say that this is a tarictic hornbill . . . which is an endangered species and very hard to find. all philippine hornbills however are considered endangered. perhaps no future skulls are going to be available due to scarcity of these one. . . . The killing of these birds are already being prohibited so its rare to find one.

On September 22nd, Gomez confirmed receipt of the hornbill by e-mail and requested additional specimens. In June and September 2010, Gomez made corresponding PayPal payments to this shipper totaling \$330. In September, the supplier sent Gomez directions through PayPal stating:

Note from the merchant. Hello Sir Enrique. Just follow this paypal money request to send your payment for the hornbill skull.

On October 29, 2010, Gomez e-mailed his Philippines-based supplier, advising:

i just sent you the money. can you please ship to ((henry gomez 6754 n. e.. 4 ave. miami flo 33138) thank you let me know when you get other ones.

In December 2010, according to e-mails and USFWS records, Gomez received various hornbills from the Philippines without declaring them or acquiring required permits. On December 18, 2010, Gomez confirmed receipt of a new shipment of hornbills from the supplier in an e-mail, including photographs of the hornbills, but complained:

i just opened the hornbills you sent me last time. sorry to say they are in terrible condition. i'm sending you photos of them so you can see. what can we do? Please let me know thank you enrique.

Canada

18. On or about December 22, 2010, Gomez made a \$124 PayPal payment to an Ebay seller in Canada for "REAL black-casqued hornbill skull" and "REAL yellow-casqued hornbill." According to expert examination of the items seized from Gomez during the February 17, 2011 search, there were numerous yellow and black-casqued hornbills in his possession.

China

19. According to USPS, on or about August 23, 2010, Gomez received a package with tracking number EE467219138CN from China. During his interview in February 2011, Gomez admitted that he received an undeclared kingfisher in this shipment.

SELECTED STATEMENTS MADE BY GOMEZ

20. On July 15, 2010, during an undercover contact with Gomez at his studio on 70 NE 17th Street in Miami, Gomez identified owls that he had illegally acquired from Indonesia.

21. On September 22, 2010, during an undercover contact with Gomez at his studio in Miami, Gomez made the following statements regarding wildlife specimens in his studio:

- A. The stork was acquired from Uruguay;
- B. The crested eagle (or hawk-eagle) he recently mounted was from Indonesia;
- C. The mounted civet cats were bred in Indonesia.

22. On November 13, 2010, during an undercover contact with Gomez at his studio in Miami, Gomez made the following statements regarding artwork pieces in his studio:

- A. He was covering the rhinoceros bust with beetle elytra from Thailand. (He then exhibited the three bags containing beetle elytra);
- B. The walrus bust piece that he covered in beetle elytra was sold to a hotel in Kentucky;
- C. A person cannot sell birds of prey in the United States wherever their origin;
- D. He referred to skulls - babirusa, hornbills, and muntjac - that he acquired from Borneo and to a Rhinoceros Hornbill skull that he acquired from Indonesia.

23. On December 5, 2010, a USFWS agent attended Art Basel, a gallery exhibition in Miami Beach, Florida. During the visit, he observed one of Gomez's art pieces that incorporated the stork from Uruguay referenced in paragraph 21, supra.

24. On February 17, 2011, during an interview with USFWS Special Agent Eugene Bendele, Gomez made the following statements:

- A. He sold "I Am Walrus" to a museum in Kentucky for \$25,000;
- B. "Rhinoplasty" was sold and shipped to a buyer in Canada;
- C. "WTF" contained ibis bill;
- D. "Cherub" contained ibis;
- E. "Earth Spirit" contained African hornbill and was sold to a buyer in New York;
- F. "Earth, Sea, Sky" contained box turtle;
- G. "Narcissist" contained African hornbill;
- H. "Pandemonium" contained hornbill;
- I. "Paradise" contained hornbill and bird of paradise;
- J. The beetle elytra he used for the walrus, rhino and giraffe busts came from Thailand;
- K. He purchased birds on ebay from Indonesia;
- L. He received a black and white pied kingfisher from China;
- M. He looked at an orangutan skull in Thailand or Bali. After he returned to the United States, he purchased a carved orangutan skull in 2010, and had it sent to him in Miami, but did not declare the skull;
- N. The hornbill skulls are of foreign origin;
- O. He was aware with CITES due to the items seized by USFWS in New York. He stated that he was familiar with the ESA and Migratory Bird Treaty Act (MBTA);
- P. He stated that he knew the shipments following the two seized in New York were illegal;
- Q. He stated that he received dried birds of paradise, fruit bats, and a civet cat from Indonesia a few months prior and was aware that receiving the spotted cat (located in his freezer) and a black eagle from Indonesia was illegal; and
- R. He stated that carbon paper helped shipments of items avoid detection when entering the United States; he stated that he received birds of paradise from Indonesia wrapped in carbon paper and knew the birds were illegal; he stated he had received an orangutan skull wrapped in carbon paper as well as owls from Indonesia, that he asked be wrapped in carbon paper to avoid detection.

SALES / PURCHASES MADE BY GOMEZ TO THE UNDERCOVER AGENT

25. On July 15, 2010, Gomez sold the following items of wildlife to a USFWS undercover agent (UCA):

- A. A mounted Atlantic puffin for \$300. The Atlantic puffin (*Fratercula arctica*) is protected under the MBTA;
- B. An orangutan (*Pongo pygmaeus*) skull for \$1,000 that Gomez stated he purchased in Sumatra the year before. The orangutan is listed on Appendix I of CITES

26. On August 4, 2010, a USFWS UCA met Gomez at his studio and showed him birds Gomez was interested in buying. The UCA informed Gomez that he did not have any papers for these birds. Gomez purchased the following birds for \$500:

- A. One (1) sandhill crane (*Grus Canadensis*);
- B. One (1) trumpeter swan (*Cygnus buccinator*);
- C. One (1) snowy owl (*Nyctea scandiaca*); and
- D. One (1) anhinga (*Anhinga anhinga*).

27. On September 22, 2010, during a contact with a USFWS UCA at his shop, Gomez commented that he would need to get a "permit somehow . . . for the anhinga . . . and the white owl," referring to the anhinga he purchased from the UCA on August 4, 2010.

28. On January 4, 2011, Gomez sent an e-mail to a USFWS UCA offering the remains of birds for sale and attached photos with the following titles/descriptions: "helmeted hornbill from malay peninsula the only hornbill good for carving"; "rhinoceros hornbill skull"; "java hawk eagle"; and "wood owl from Indonesia."

29. On January 29, 2011, the UCA met Gomez at his studio, and Gomez sold him the following birds for \$2,700:

- A. One (1) crested serpent eagle (*Spilornis cheela*);
- B. One (1) Indonesian spotted wood owl (*Strix seloputo*);
- C. One (1) helmeted hornbill (*Buceros vigii*) skull; and
- D. One (1) rhinoceros hornbill (*Buceros rhinoceros*) skull.

ART PIECES INCORPORATING IMPORTED/PROTECTED WILDLIFE

30. Enrique Gomez De Molina designs and produces taxidermy pieces for sale that contain various parts of wildlife species. These pieces are exhibited in galleries and online. Listed below are examples of his pieces and some of the wildlife parts used in the art work:

	ART PIECE & CONTENTS	DATE SOLD	PRICE
1	"Rhinoplasty" Covered with beetle elytra from Thailand.	~ 12/12/10 Canada	\$80,000
2	"Cherub" Contains Sacred ibis (<i>Threskiornis aethiopicus</i>) skull; advertised to contain a civet (cat) (<i>Spilogale putorius</i>) tail	~ 12/12/10	\$12,000
3	"Pandora" Contains trumpeter swan and dik-dik		\$25,000
4	"Sunday Morning" Contains parts from a male Himalayan Monal (<i>Lophophorus impejanus</i>)	~ 12/3/10	\$1,000
5	"Mystic"	~ 12/2/10	\$12,000
6	"Queen of the Desert"	~ 12/2/10	\$7,200
7	"Squirdle" Contains box turtle	~ 3/8/10	\$4,500
8	"Screature" Contains the head of an MBTA portected gull	~ 3/8/10	\$8,500
9	"I Am Walrus" is covered in beetle elytra from Thailand	~ 3/8/10	\$25,000
10	"Earth Spirit" Contains hornbill	~ 3/8/10	\$13,000
11	"WTF" Contains ibis (<i>Threskiornis aethiopicus</i>) skull	~ 1/18/10	\$4,500

12	"Narcissist" Contains hornbill spp.	~ 1/1/09	\$6,300
13	"Out for a Walk" Contains the head of an MBTA protected rail (genus <i>Rallus</i>)	~ 1/18/10	\$2,000
14	"Earth, Wind & Sea" Contains box turtle - all are listed in CITES		\$2,000
15	"Paradise" Contains an unspecified bird of paradise feathers and rhinoceros hornbill (<i>Buceros rhinoceros</i>)		\$25,000
16	"Warrior" Contains the body of an MBTA protected rail (genus <i>Rallus</i>)		\$500
17	"The Creator" Contains box turtle		
18	"Pandemonium" Contains a yellow-casqued hornbill (<i>Ceratogymna elata</i>)		
19	The Giraffe Bust Covered in beetle elytra.		
20	"Aroused" Contains parts from a male Himalayan Monal (<i>Lophophorus impejanus</i>) listed on Appendix I on CITES		

[SPACE INTENTIONALLY LEFT BLANK]

31. In sum, defendant ENRIQUE GOMEZ DE MOLINA, knowingly transported, possessed or sold the following wildlife:

- A. From the September 24, 2009 shipment from Indonesia to the United States: one (1) skin of a Java kingfisher (*Halcyon cyanoventris*), one (1) skin of a collared kingfisher (*Todiramphus chloris*), one (1) mounted lesser bird of paradise (*Paradisaea minor*), one (1) skin of an unspecified juvenile hawk-eagle (*Spizaetus* sp.), one (1) carcass remnant of a slow loris (*Nycticebus coucang*), one (1) carcass remnant of a lesser mouse deer (*Tragulus javanicus*);
- B. From the December 1, 2009 shipment from Indonesia to the United States: one (1) slow loris, one (1) hawk eagle, and one (1) giant squirrel (*Ratufa* sp.);
- C. From the April 27, 2010 and January 3, 2011 shipments from Thailand to the United States: beetle (*Sternocera aeq*) elytra;
- D. From the June 11, 2010 shipment from Indonesia to the United States: one (1) hawk eagle (*Spizaetus* sp.), one (1) Sunda pangolin (*Manis javanica*) and two (2) unidentified heron species;
- E. From the June 29, 2010 shipment from Indonesia of one (1) wreathed hornbill (*Rhyticeros undulatus*);
- F. From the July 15, 2010 sale of one (1) Atlantic puffin (*Fratercula arctica*) and one (1) orangutan (*Pongo pygmaeus*) skull to an undercover agent;
- G. From the August 4, 2010 purchase of one (1) sandhill crane (*Grus Canadensis*); one (1) trumpeter swan (*Cygnus buccinator*); one (1) snowy owl (*Nyctea scandiaca*); and one (1) anhinga (*Anhinga anhinga*) from an undercover agent;
- H. From the August 23, 2010 shipment from China to the United States: one (1) kingfisher;
- I. From the August 31, 2010 shipment from Bali, Indonesia to the United States: one (1) babirusa (*Babyrousa babyrussa*) skull, one (a) orangutan (*Pongo pygmaeus*) skull, and four (4) helmeted hornbill skulls;

- J. From the September 27, 2010 shipment from Jakarta, Indonesia to the United States: four (4) various species of birds of paradise, two (2) wild cats, one (1) asian fairy blue (*Irena puella*), and one (1) silver eared mesia (*Leiothrix argenteauris*);
- K. From October 2, 2010 shipment from Bali, Indonesia to the United States, deer skulls;
- L. From the December 2010 shipment from the Philippines to the United States: hornbill species;
- M. From the December 22, 2010 shipment from Canada to the United States: black-casqued hornbill (*Ceratogymna atrata*) skull and yellow-casqued hornbill (*Ceratogymna elata*);
- N. From the January 29, 2011 sale of one (1) crested serpent eagle (*Spilornis cheela*); one (1) Indonesian spotted wood Owl (*Strix seloputo*); one (1) helmeted hornbill (*Buceros vigii*) skull; and one (1) rhinoceros hornbill (*Buceros rhinoceros*) skull to an undercover agent;
- O. From the February 4, 2011 shipment from Jakarta, Indonesia to the United States: three (3) bird of paradise, one (1) king cobra (*Ophiophagus hannah*), and one (1) wooly stork (*Ciconia episcopus*); and
- P. From the February 2011 shipment from Bali, Indonesia to the United States: muntjac skulls;

knowing that said wildlife was possessed and transported in violation of and in a manner unlawful under the laws and regulations of the United States, specifically Sections 23.13(a), 14.52 and 14.61, in violation of Title 16, United States Code, Sections 3372(a)(1) and 3373(d)(1)(B); and Title 18, United States Code, Section 2, as charged in Count 1 of the Information and relevant conduct.

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

Date: 11/28/11

By: *Thomas Watts-FitzGerald*
Thomas A. Watts-FitzGerald
Assistant States Attorney

Date: 11/28/11

By: *P. Watts-FitzGerald, poss, for*
Shennie Patel
Trial Attorney
Environmental Crimes Section

Date: 11.21.11

By: *Benedict P. Kuehne*
BENEDICT KUEHNE, ESQ.
ATTORNEY FOR DEFENDANT

Date: 11.21.11

By: *Enrique Gomez de Molina*
ENRIQUE GOMEZ DE MOLINA
DEFENDANT