

UNITED STATES DEPARTMENT OF AGRICULTURE
BEFORE THE SECRETARY OF AGRICULTURE

REC'D - USDA/OALJ/HCO
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In re:)
) AWA Docket No. 22- J-0027
)
Thomas Edmonds, an individual dba)
Walnut Prairie Wildside Zoo, aka)
Walnut Prairie Wild Side)
)
Respondent.) COMPLAINT

There is reason to believe that the Respondent named herein has willfully violated the Animal Welfare Act, as amended (7 U.S.C. § 2131 et seq.)(AWA or Act), and the regulations issued thereunder (9 C.F.R. Part 2) (Regulations). Therefore, the Administrator of the Animal and Plant Health Inspection Service (APHIS) issues this complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. Respondent Thomas Edmonds is an individual doing business as Walnut Prairie Wildside Zoo, aka Walnut Prairie Wild Side, and whose mailing address is 204 Mulberry Street, West Union, Illinois 62477. At all times material herein, Respondent operated as either an exhibitor and/or a dealer as those terms are defined in the Act and the Regulations and has held AWA license 33-B-0435 since January 1, 2016.

ALLEGED VIOLATIONS

2. On June 19, 2021, Respondent operated as an exhibitor, as that term is defined in the Act and the Regulations, by providing a public tour of his facility, without a valid license and a willful violation of Section 2134 of the Act (7 U.S.C. § 2134).

3. On or about March 7, 2019, Respondent failed to provide APHIS officials with access to conduct an inspection of Respondent's facilities, animals and records, or to make an authorized person available to accompany APHIS officials on such inspections, in willful violation of the Act and the Regulations (7 U.S.C. § 2146(a); 9 C.F.R. §2.126)).
4. On or about the following dates, Respondent willfully violated the handling Regulations (9 C.F.R. § 2.131) as specified below:
 - a. May 8, 2019. Respondent failed to handle a tiger cub during exhibition, with minimal risk of harm to the animals and the public, and specifically, Respondent allowed an unsupervised member of the public to pick up the cub and put her fingers in its mouth for a photo, and then dropped the cub on its head. 9 C.F.R. §§ 2.131(a), 2.131(b)(1), 2.131(c)(1).
 - b. May 8, 2019. Respondent failed to handle a tiger cub as carefully as possible in a manner that does not cause trauma, behavioral stress, physical harm, or unnecessary discomfort, and specifically, allowed an unsupervised member of the public to lower the cub while the cub twisted and had its back parallel to the ground. 9 C.F.R. §§ 2.131(a), 2.131(b)(1), 2.131(c)(1).
 - c. May 8, 2019. Respondent failed to handle a tiger cub, during exhibition, with minimal risk of harm to the animals and the public, and specifically, during a compliance inspection on May 8, 2019, left the cub unleashed and unattended such that the cub approached a python exhibition. 9 C.F.R. §§ 2.131(a), 2.131(c)(1).
 - d. May 8, 2019. Respondent failed to handle a tiger cub, during exhibition, with minimal risk of harm to the animals and the public, and specifically, allowed a volunteer to handle the cub so that the cub pulled to the end of its harness and

repeatedly bit and chewed at the ankles of members of the public, including a four-year old child. 9 C.F.R. §§ 2.131(a), 2.131(c)(1).

- e. July 6, 2019. Respondent failed to handle a lynx, during exhibition, with minimal risk of harm to the animals and the public, and specifically, allowed an unsupervised group of members of the public to approach the lynx's primary enclosure beyond the public barrier. The lynx reached through the primary fence and injured a two-and-a-half-year-old boy's head, forehead and forearm. 9 C.F.R. § 2.131(c)(1).
- f. July 13, 2019. Respondent failed to handle a prairie dog, during exhibition, with minimal risk of harm to the animals and the public, and specifically, allowed an unsupervised member of the public to put their hand inside an open-top prairie dog enclosure. The prairie dog bit the individual's finger. 9 C.F.R. § 2.131(c)(1).
- g. July 17, 2019. Respondent failed to handle two lemurs, during exhibition, with minimal risk of harm to the animals and the public, and specifically, left members of the public unattended inside the lemurs' enclosure. 9 C.F.R. § 2.131(c)(1).
- h. July 17, 2019. Respondent failed to handle two coatimundi and a raccoon, during exhibition, with minimal risk of harm to the animals and the public, and specifically, left members of the public unattended inside the enclosure housing these animals. 9 C.F.R. § 2.131(c)(1).
- i. July 17, 2019. Respondent failed to handle two vervet monkeys, during exhibition, with minimal risk of harm to the animals and the public, and specifically, allowed a young child to stick his hand through the wire fence to the inside of the vervet monkey enclosure. 9 C.F.R. § 2.131(c)(1).

- j. July 17, 2019. Respondent failed to handle two vervet monkeys, during exhibition, with minimal risk of harm to the animals and the public, and specifically, allowed members of the public to feed and interact with the primates. 9 C.F.R. § 2.131(c)(1).
- k. November 19, 2019. Respondent failed to handle a tiger with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).
- l. December 1, 2019. Respondent failed to handle a tiger with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animal and the public in at least two separate instances. 9 C.F.R. § 2.131(c)(1).
- m. December 14, 2019. Respondent failed to handle a tiger with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).
- n. December 18, 2019. Respondent failed to handle a tiger with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).
- o. December 30, 2019. Respondent failed to handle a tiger with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).

- p. June 17, 2020. Respondent failed to demonstrate adequate experience and knowledge of an adult tiger he maintained, and specifically, allowed and/or encouraged a facility representative to handle an adult tiger with a rope looped around the tiger's neck in at least two separate instances. 9 C.F.R. §§ 2.131(a), 2.131(c).
- q. June 20, 2020. Respondent failed to demonstrate adequate experience and knowledge of two adult tigers he maintained, and specifically, allowed and/or encouraged a facility representative to bottle feed two adult tigers while sitting between the two tigers. 9 C.F.R. § 2.131(a).
- r. September 3, 2020. Respondent failed to demonstrate adequate experience and knowledge of two adult tigers he maintained, and specifically, allowed and/or encouraged a volunteer to take a picture while the volunteer is sandwiched between the two tigers, while a tiger has one paw on the volunteer's shoulder and is licking the volunteer's head, and with the tiger's paws on the volunteer's forearms as the volunteer stands and bottle feeds the tiger. 9 C.F.R. §§ 2.131(a), 2.131(c).
- s. September 20, 2020. Respondent failed to handle a serval kitten with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the serval kitten without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).
- t. October 24, 2020. Respondent failed to demonstrate adequate experience and knowledge of an adult tiger he maintained, and specifically, allowed and/or encouraged a volunteer to bottle feed an adult tiger with the tiger standing in front of her with its paws on her shoulders. 9 C.F.R. § 2.131(a).

- u. December 29, 2020. Respondent failed to demonstrate adequate experience or knowledge of an adult tiger he maintained, and specifically, allowed and/or encouraged a volunteer to feed the tiger a boiled egg from the volunteer's mouth. 9 C.F.R. § 2.131(a).
 - v. March 8, 2021. Respondent failed to demonstrate adequate experience and knowledge of an adult tiger he maintained, and specifically, allowed and/or encouraged a volunteer to stand under the male tiger, approximately over 500 pounds, as the tiger stood on his back feet. 9 C.F.R. § 2.131(a).
 - w. March 10, 2021. Respondent failed to demonstrate adequate experience and knowledge of the two adult tigers he maintained, and specifically, Respondent agreed that the tigers were obese and needed to lose weight. 9 C.F.R. § 2.131(a).
 - x. March 10, 2021. Respondent failed to handle a cougar with minimal risk of harm to the animal and the public, and specifically, allowed a young girl to put her fingers through the wire to pet the cougar. 9 C.F.R. § 2.131(c)(1).
 - y. March 24, 2021. Respondent failed to handle a juvenile cougar with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the cougar without any distance or barriers between the animal and the public. 9 C.F.R. § 2.131(c)(1).
 - z. August 25, 2021. Respondent failed to demonstrate adequate experience and knowledge of adult tigers and cougars he maintained. 9 C.F.R. § 2.131(a).
5. On or about the following dates, Respondent willfully violated the veterinary care Regulations as specified below:

- a. Between July 2020 and March 10, 2021, Respondent failed to obtain adequate veterinary care for a short-tailed opossum with brown scabs covering the tips of both ears. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
- b. March 10, 2021, Respondent failed to obtain adequate veterinary care for two tigers that were obese, and specifically, Respondent did not communicate with a veterinarian regarding the tigers. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
- c. Between at least March 10, 2021 and June 30, 2021, Respondent failed to employ an attending veterinarian to provide adequate veterinary care to Respondent's animals and failed to establish and maintain a written program of veterinary care. 9 C.F.R. §§ 2.40(a), 2.40(a)(1).
- d. March and April 2021. Respondent failed to obtain adequate veterinary care for a cougar that was extremely thin, exhibited signs of dehydration, passed liquid diarrhea, and was not eating well. Specifically, Respondent did not obtain any veterinary care for the cougar. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
- e. April 29, 2021. Respondent failed to obtain adequate veterinary care for two vervet monkeys, and specifically, Respondent did not have a formal arrangement with an attending veterinarian and failed to obtain veterinary care for the vervet monkeys. The two vervet monkeys died in April 2021. 9 C.F.R. §§ 2.40(a), 2.40(a)(1), 2.40(b).
- f. May 5, 2021. Respondent failed to obtain adequate veterinary care for a ring-tailed lemur that died due to unknown causes, and specifically, Respondent housed the ring-tailed lemur in the same enclosure the vervet monkeys referenced in paragraph 10e had been housed in, did not have a formal arrangement with an attending

veterinarian for the ring-tailed lemur, and failed to obtain any veterinary care for the ring-tailed lemur. 9 C.F.R. §§ 2.40(a), 2.40(a)(1), 2.40(b).

- g. July 6, 2021. Respondent failed to demonstrate adequate veterinary care for a macaque he maintained, and specifically, Respondent housed at least one macaque in the enclosure referenced in paragraphs 10e and 10f. The necropsy result for the ring-tailed lemur referenced in paragraph 10f revealed the cause of death was toxoplasmosis. 9 C.F.R. §§ 2.40(a), 2.40(a)(1), 2.40(b).
6. On or about the following dates, Respondent willfully violated the records Regulations (9 C.F.R. § 2.75):
- a. December 2, 2020. Respondent failed to make, keep, and maintain records or forms that fully and correctly disclose the acquisition and disposition of animals for the APHIS inspector's review. 9 C.F.R. §§ 2.75(a), 2.75(b).
 - b. March 10, 2021. Respondent failed to make, keep, and maintain records or forms that fully and correctly disclose the acquisition and disposition of animals for the APHIS inspector's review. Specifically, only a partial record inventory was available but lacked 'acquired from' addresses and the addition of four domestic cats brought to the property. 9 C.F.R. §§ 2.75(a), 2.75(b).
 - c. August 25, 2021. Respondent failed to make, keep, and maintain records or forms that fully and correctly disclose the acquisition and disposition of animals for the APHIS inspector's review. Specifically, Respondent failed to maintain complete birth records for kittens born at the property on proper USDA record forms for cats and the information on the litters was incomplete. 9 C.F.R. §§ 2.75(a), 2.75(b).

7. On or about March 10, 2021, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a) by failing to meet Standards, and specifically, Respondent failed to provide multiple domestic cats with adequate shelter to protect them inclement weather. 9 C.F.R. § 3.4(b).
8. On or about March 10, 2021, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a) by failing to meet Standards, and specifically, Respondent failed to provide potable water to multiple domestic cats. 9 C.F.R. § 3.10.
9. On or about June 3, 2021, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a) by failing to meet Standards, and specifically, Respondent failed to clean and sanitize the primary enclosure for two kittens as required. 9 C.F.R. § 3.11(b).
10. On or about the following dates, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to meet housing Standards (9 C.F.R. § 3.75):
 - a. May 8, 2019. Respondent housed two lemurs and two vervet monkeys in enclosures with wooden surfaces that cannot be readily cleaned and sanitized and are not being replaced when worn or soiled. 9 C.F.R. § 3.75(c)(1).
 - b. July 18, 2019. Respondent housed two lemurs and two vervet monkeys in enclosures with wooden surfaces that cannot be readily cleaned and sanitized and not being replaced when worn or soiled. 9 C.F.R. § 3.75(c)(1).
 - c. March 3, 2021. Respondent housed a squirrel monkey, a marmoset, a ruffed lemur, a macaque, and two ring-tailed lemurs in enclosures with wooden surfaces that cannot be readily cleaned and sanitized and are not being replaced when worn or soiled. 9 C.F.R. § 3.75(c)(1).

- d. June 3, 2021. Respondent housed four ring-tailed lemurs, an Albifron lemur, a macaque, a ruffed lemur in enclosures with wooden surfaces that cannot be readily cleaned and sanitized and are not being replaced when worn or soiled. 9 C.F.R. § 3.75(c)(1).
11. On or about the following dates, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to provide outdoor facilities complying with the Standards (9 C.F.R. § 3.78):
- a. December 2, 2020. Respondent housed multiple white-headed lemurs in an enclosure lacking a barrier from the public access areas. 9 C.F.R. § 3.78(e).
 - b. December 2, 2020. Respondent housed a Japanese macaque in an enclosure lacking a barrier from the public access areas. 9 C.F.R. § 3.78(e).
 - c. March 3, 2021. APHIS inspectors noted that, in at least the preceding six months, Respondent repeatedly used the Japanese macaque for full contact public handling while not in direct control of a trained keeper. 9 C.F.R. § 3.78(e).
12. On or about the March 9, 2019, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to provide primary enclosures complying with the following Standards (9 C.F.R. § 3.80):
- a. Respondent housed 2 Albifron lemurs in a primary enclosure not cleaned and sanitized frequently enough to prevent buildup of dirt and debris. 9 C.F.R. § 3.80(a)(2)(ix).
 - b. Respondent housed 2 vervet monkeys in a primary enclosure not cleaned and sanitized frequently enough to prevent buildup of dirt and debris. 9 C.F.R. § 3.80(a)(2)(ix).

13. On or about the following dates, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to provide an environment enhancement plan for non-human primates complying with the Standards (9 C.F.R. § 3.81):
- a. December 2, 2020. Respondent failed to develop, document, and follow an appropriate plan for environment enhancement to promote the psychological well-being of nonhuman primates, in accordance with currently accepted professional standards, made available to APHIS upon request. 9 C.F.R. § 3.81.
 - b. March 10, 2021. Respondent failed to develop, document, and follow an appropriate plan for environment enhancement to promote the psychological well-being of nonhuman primates, in accordance with currently accepted professional standards, made available to APHIS upon request. 9 C.F.R. § 3.81.
14. On or about August 25, 2021, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to provide potable water in sufficient quantity to every nonhuman primate housed at the facility. Specifically, Respondent maintained a water bowl with green algae on the bottom of the bowl and a plastic tub of water with dark green algae in an enclosure housing four lemurs. 9 C.F.R. § 3.83.
15. On or about May 8, 2019, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to provide facilities complying with the following minimum Standards (9 C.F.R. § 3.125):
- c. Respondent housed a Fennec Fox in an enclosure without a functioning lock system, with the door being kept closed with a stick under the door. 9 C.F.R. § 3.125(a).

- d. Respondent housed two porcupines in an enclosure with a 2ft x 2ft piece of metal sheeting used to temporarily block the door opening, which was easily capable of escape. 9 C.F.R. § 3.125(a).
 - e. Respondent housed multiple foxes in two separate enclosures with a deep hole exposing the diamond mesh fence beneath the mulch flooring, creating a hazard for animal injury or escape. 9 C.F.R. § 3.125(a).
 - f. Respondent housed multiple foxes in two separate enclosures containing an accumulation of feather, bone, and fecal debris due to inadequate cleaning and waste removal/disposal practices. 9 C.F.R. § 3.125(d).
 - g. Respondent housed a Geoffroy's cat in an enclosure containing an accumulation of feather, bone, and fecal debris due to inadequate cleaning and waste removal/disposal practices. 9 C.F.R. § 3.125(d).
 - h. Respondent housed a Serval in an enclosure containing an accumulation of feather, bone, and fecal debris due to inadequate cleaning and waste removal/disposal practices. 9 C.F.R. § 3.125(d).
 - i. Respondent housed a lynx in an enclosure containing an accumulation of feather, bone, and fecal debris due to inadequate cleaning and waste removal/disposal practices. 9 C.F.R. § 3.125(d).
16. On or about the following dates, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a) by failing to provide facilities complying with the following minimum Standards (9 C.F.R. § 3.127):
- j. May 9, 2017. Respondent housed multiple lynx in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the lynx

from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).

- k. May 8, 2019. Respondent housed multiple Albifron lemurs, badgers, and a Geoffrey cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).
- l. July 18, 2019. Respondent housed multiple Albifron lemurs, vervet monkeys, badgers, coatis, raccoons, tigers, porcupines, and a Geoffrey's cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).
- m. January 16, 2020. Respondent housed multiple Albifron lemurs, coatis, badgers, porcupines, bobcats, tigers, and a Geoffrey's cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).
- n. December 2, 2020. Respondent housed multiple badgers, bobcats, coatis, porcupines, skunks, and a macaque in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals

from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).

- o. March 10, 2021. Respondent housed multiple tigers, cougars, Albifron lemurs, coatis, badgers, a bobcat, a macaque, and a Geoffrey's cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).
- p. June 3, 2021. Respondent housed multiple tigers, cougars, Albifron lemurs, coatis, badgers, four ring-tailed lemurs, a ruffed lemur, a bobcat and a Geoffrey's cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).
- q. August 25, 2021. Respondent housed multiple tigers, cougars, coatis, badgers, caviés, nonhuman primates, a bobcat, and a Geoffrey's cat in facilities that were not enclosed by a perimeter fence of sufficient height and structural strength to protect the animals from injury, function as a secondary containment system, and prevent the animals from physical contact with persons or other animals outside the fence. 9 C.F.R. § 3.127(d).

ALLEGATIONS REGARDING SIZE OF BUSINESS, GOOD FAITH, AND HISTORY
OF PREVIOUS VIOLATIONS

17. At all times material herein, Respondent operated a zoo (as that term is defined in the Regulations) exhibiting wild and exotic animals in West Union, Illinois. On December 4, 2018, Respondent represented to APHIS that he held six (6) animals; around January 2020, Respondent represented to APHIS that he held 45 animals; in January 2021, Respondent represented to APHIS that he held 82 animals. On March 18, 2021, Respondent represented to APHIS that he held ninety-six (96) animals (1 dog, 14 cats, 5 guinea pigs, 2 hamsters, 10 farm animals, 36 other animals, 13 non-human primates, 10 exotic/wild felids and hybrids, and 5 hyenas, exotic/wild canids or hybrids).
18. As early as 2019, APHIS advised Respondent not to exhibit or handle animals without sufficient distance and/or barriers between the animals and the public. Nevertheless, as alleged herein, Respondent has failed on multiple occasions to comply with the handling Regulations, which has also resulted in injuries to the public. Respondent exhibits an evasive attitude towards regulatory compliance, which is obvious from the continued lack of response to written violations, repeat instances of non-compliance, and his “learn as he goes” mantra, as alleged herein. Additionally, Respondent continues to ignore any guidance or resources APHIS has offered when acquiring a new species. Above all, Respondent continues to provide incomplete information, false statements, and a flagrant disregard for AWA requirements in communications to APHIS personnel.
19. Respondent also has a history of violations under the laws of the State of Illinois. In 2019, Respondent pled guilty in Case No. 2019CV8 0 Clark County, IL to an illegal possession of an alligator without a Special Use Herptile Permit, a Class A Misdemeanor under Illinois

State law. Additionally, Illinois Conservation Police observed Respondent exhibiting the alligator in an enclosure that was not escape-proof and without a band around its mouth, as required under Illinois State law, and confiscated the alligator from Respondent on August 29, 2019. Also, in 2019, Illinois Conservation Police confiscated a bobcat from Respondent that Respondent obtained improperly and exhibited against State law. On August 20, 2020, Illinois Conservation Police issued Respondent a written warning for the illegal possession and sale of striped skunk.

20. By letter dated June 15, 2021, pursuant to 7 U.S.C. § 2149, APHIS suspended AWA license 33-B-0435 for 21 days. The suspension letter stated:

We are taking this action because we have reason to believe that you have willfully violated, *inter alia*, sections 2.40(a)(1), 2.40(b)(2), 2.75, 2.75(a)(1), 2.126(b), 2.131, 2.131(a), and 2.131(c)(1) of the regulations issued under the AWA (9 C.F.R. Part 2)(Regulations), and failed to meet the minimum standards for animals, (9 C.F.R. Part 3)(Standards), specifically 9 C.F.R. §§ 3.4(b), 3.10(b), 3.11(b), 3.75(c)(1), 3.78(e), 3.80(a)(2)(ix), 3.81, 3.125(a), 3.125(d), 3.127, 3.127(b), 3.127(d), and 3.131(d) . . . It is a violation of the Regulations to buy, sell, transport, exhibit, or deliver for transportation, any “animal,” as that term is defined in the Act and the Regulations, during the period of suspension. 9 C.F.R. § 2.10(c). This prohibition applies to you and to any employee, agent or other person acting on your behalf. Failure to comply with this prohibition may subject you to sanctions authorized by the Act. 7 U.S.C. § 2149.

Despite having his AWA license suspended on June 18, 2021 for a period of 21 days, Respondent continued to violate the AWA and its implementing regulations.

Specifically, on June 19, 2021, Respondent exhibited animals at his facility to members of the public without a valid license in direct violation of 7 U.S.C. § 2134.

WHEREFORE, it is hereby ordered that for the purpose of determining whether the respondents have in fact willfully violated the Act and the Regulations issued under the Act, this

complaint shall be served upon the respondent. The respondent shall file an answer with the Hearing Clerk, United States Department of Agriculture, Washington, D.C. 20250-9200, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. § 1.130 et seq.). Failure to file a timely answer shall constitute an admission of all the material allegations of this complaint. APHIS requests that this matter proceed expeditiously in conformity with the Rules of Practices governing proceedings under the Act; and that such order or orders be issued as are authorized by the Act and warranted under the circumstances, including revocation of license 33-B-0435, and civil penalties as warranted under the circumstances.

Done at Washington, D.C.
this 31st day of January, 2022

Kevin Shea
Administrator
Animal and Plant Health Inspection Service

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