

November 29, 2022

Casey R. Krueger  
Chief Warden  
Division of Public Safety and Resource Protection  
Wisconsin Department of Natural Resources

Via email: [REDACTED]

**Re: Request to Investigate Matt and Alice Schoebel (License No. 1824) for Apparent Violations of Wisconsin Law**

Dear Chief Krueger:

I am writing on behalf of PETA to request that the Wisconsin Department of Natural Resources (“the Department”) investigate Matt and Alice Schoebel for apparent violations of WIS. STAT. §§ 169.33, 169.36 and WIS. ADMIN. CODE § NR 16.50. Matt and Alice Schoebel (“the Schoebels”) hold a Wisconsin Class A Captive Wild Animal Farm License and a Wild Fur Farm License under the license number 1824.<sup>1</sup>

If a person licensed under Chapter 169—which governs captive wildlife—conducts any transaction involving a protected species, the licensee must report that transaction to the Department on a quarterly and annual basis.<sup>2</sup> The Department may not renew a license where the licensee has failed to submit the required records in a timely manner.<sup>3</sup> And, the Department may revoke a license where the licensee fails to comply with the captive wildlife regulations and any license it believes to be erroneously issued.<sup>4</sup>

As detailed in the attached appendix, the Schoebels have repeatedly failed to submit required records and those that they do submit are often late, inaccurate or incomplete in apparent violation of WIS. STAT. §§ 169.33, 169.36. Despite these apparent violations, the Department has continued to renew their licenses. Accordingly, PETA respectfully requests that the Department investigate the Schoebels for violations of Wisconsin law and hold them fully accountable, including by revoking their Captive Wild Animal Farm and Wild Fur Farm licenses.

Thank you for your attention to this important matter.

Sincerely,

Cydnee Bence  
Legal Fellow, PETA Foundation  
[REDACTED]

<sup>1</sup> Ex. 1, State of Wisconsin, Class A Captive Wild Animal Farm License (Feb. 03, 2022); Ex. 2, State of Wisconsin, Wild Fur Farm License (Jan. 13, 2021).

<sup>2</sup> WIS. STAT. § 169.36(9)-(10).

<sup>3</sup> WIS. ADMIN. CODE § NR 16.50(1)(b).

<sup>4</sup> WIS. STAT. §§ 169.33(4m), 169.45(7).

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
FOUNDATION

Washington  
1536 16th St. N.W.  
Washington, DC 20036  
202-483-PETA

Los Angeles  
2154 W. Sunset Blvd.  
Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
Norfolk, VA 23510  
757-622-PETA

PETA FOUNDATION IS AN OPERATING  
NAME OF THE FOUNDATION TO  
SUPPORT ANIMAL PROTECTION.

ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

## Appendix

The Schoebels operate under the names *Animal Entertainments, Inc.*, *Shamba Safari*, and *Timbavati Wildlife Park*.<sup>5</sup> In addition to their Wisconsin licenses, the Schoebels hold a U.S. Department of Agriculture (“USDA”) exhibitor’s license (license no. 35-C-0367) and Alice Schoebel held a dealer’s license (license no. 35-B-0222).<sup>6</sup> Since at least 2015, the Schoebels have repeatedly failed to submit multiple reports and frequently submit late, inaccurate, and incomplete reports in apparent violation of Wisconsin law.

### I. Legal Context

Accurate and timely record keeping and reporting by licensees is essential for the Department to ensure animal welfare and public safety. Accordingly, under Wisconsin law a CWAF holder must report transactions involving animals in the families *canidae*, *ursidae*, *mustelidae*, or *felidae*, as well as any “harmful wild animal.”<sup>7</sup> The Department has stated that it focuses its enforcement on native species and “harmful wild animals,” and therefore specifically requires that licensees report transactions involving “bear, cougar, wolf-dog hybrid, mute swan, bobcat, lynx, coyote, fox, wolf, badger, mink, otter, fisher, martin, wolverine and skunk.”<sup>8</sup>

Reports must be correct, complete, and submitted on a quarterly and annual basis.<sup>9</sup> If a “licensee fails without good cause to submit all records required by [Chapter 169] by required deadlines or within 10 days of a request for the records” any license issued under Chapter 169 “**may not be renewed.**”<sup>10</sup> If the Department determines that a licensee is not in compliance with these record-keeping obligations, the Department may revoke any license issued under Chapter 169.<sup>11</sup> Similarly, if the Department believes a license was issued in error, the Department may revoke the person’s license.<sup>12</sup>

According to records submitted to the Department and information released through public records requests, it appears that the Schoebels have repeatedly violated Wisconsin law by:

- Failing to submit quarterly records for 2016 Q3, 2016 Q4, 2019 Q4, 2022 Q1, and 2022 Q2;
- Submitting 2016 Q1, 2016 Q2, 2018 Q3, and 2019 Q3 quarterly reports late;
- Submitting 2015 and 2016 annual reports late;
- Submitting inaccurate and incomplete reports;
- Failing to report the sale or disposition of black bears;
- Failing to report transactions involving bobcats;

---

<sup>5</sup> Ex. 1 (listing license no. 1824 as issued to Matt Schoebel, Alice Schoebel, Animal Entertainments, Inc., and Shamba Safari); Ex. 3, Alice Schoebel, Captive Wildlife Animal Farm Renewal License Application (Jan. 22, 2022) (applying under the facility name “Timbavati Wildlife Park”).

<sup>6</sup> Ex. 4, USDA, Animal Entertainments Inc. Inspection Report (Oct. 21, 2021); Ex. 5, USDA, Alice Schoebel Inspection Report (Apr. 30, 2019) (Alice’s license was cancelled on June 7, 2021).

<sup>7</sup> WIS. STAT. §§ 169.33, 169.36; WIS. ADMIN. CODE § NR 16.50

<sup>8</sup> WIS. DEPT OF NAT. RES., CAPTIVE WILD ANIMAL FARM REGULATIONS, PUB-CS-17 (Mar. 2016), <https://dnr.wi.gov/files/pdf/pubs/cs/CS0017.pdf>.

<sup>9</sup> WIS. STAT. §§ 169.36 (1), (9)-(10).

<sup>10</sup> WIS. ADMIN. CODE NR § 16.50(1)(b) (emphasis added).

<sup>11</sup> WIS. STAT. § 169.45(7).

<sup>12</sup> § 169.45(7)(a).

- Failing to report activities involving of lynx; and
- Failing to report activities involving fox.<sup>13</sup>

The Schoebels have a lengthy history of poor record keeping including missing records, late submissions, inaccurate reporting, and omitting required information.<sup>14</sup> These failures undermine the Department’s ability to hold licensees accountable and protect Wisconsin’s wildlife. On at least three occasions, the Department has confronted the Schoebels about their record keeping obligations.<sup>15</sup> Yet, the Schoebels have continued to engage in transactions involving protected animals without submitting complete, timely, and accurate records—if the records are submitted at all. The Schoebels’ failures are summarized in *Table 1*, attached, and described in detail below.

II. The Schoebels have repeatedly failed to submit timely, complete, and accurate reports as required by Wisconsin law.

a. Missing Quarterly Reports

The Schoebels have failed to submit the following quarterly reports: 2016 Q3, 2016 Q4, 2019 Q4, 2022 Q1, 2022 Q2.<sup>16</sup> Timely submission of quarterly reports is required by WIS. STAT. §§ 169.33(4m), 169.36(9)(b), and WIS. ADMIN. CODE § NR 16.50. Further, timely record submission is a necessary condition to renewing a CWAFL:

licenses issued pursuant to ch. 169, Stats., **may not** be renewed when the licensee fails without good cause to submit all records required by s. 169.36, Stats., by required deadlines or within 10 days of a request for the records.<sup>17</sup>

Records suggest that the Schoebels engaged in transactions involving regulated animals during the unreported periods.

In 2019, the Schoebels failed to submit a Q4 quarterly report.<sup>18</sup> The 2019 annual report claims that the Schoebels sold five bears that year.<sup>19</sup> Quarterly reports only account for two bears.<sup>20</sup> No other quarterly report accounts for these three missing black bears.<sup>21</sup> However, a Wisconsin Certificate of Veterinary Inspection (CVI) from April 15, 2019 shows that the Schoebels transferred three bear cubs

---

<sup>13</sup> See *Table 1*.

<sup>14</sup> *Id.*

<sup>15</sup> Ex. 6, Email from Peter Dunn, Wis. DNR to Jennifer McDonough, Wis. DNR (Feb. 13, 2019) (describing a meeting with Matt Schoebel to discuss record keeping issues with the transfer of bears from Adirondack Animal Land); Ex. 7, Email from Benjamin Nadolski, Wis. DNR to Peter Dunn, Wis. DNR (Sept. 24, 2018) (describing a meeting with Alice Schoebel regarding record discrepancies regarding the import of bears from Adirondack Animal Land; Ex. 7 (describing a previous meeting with the Schoebels when they “went over everything in detail including quarterlies and accurate reporting.”); Ex. 8, Email from Peter Dunn, Wis. DNR to Jennifer McDonough, Wis. DNR (Dec. 14, 2017) (following the unreported movement of bears to Oswald’s Bear Ranch, Department agents planned a meeting with Matt Schoebel to “cover the license obligations going forward, along with getting an accurate total on all animals reguatted [*sic*] by the state.”).

<sup>16</sup> Ex. 9, Email from Lynn Condrey, Wis. DNR to redacted recipient (Oct. 2, 2021); Ex. 10, Email from Lynn Condrey, Wis. DNR to Eric Follett (Aug. 25, 2022)(stating, “I verified that there were no reports submitted.”).

<sup>17</sup> WIS. ADMIN. CODE § NR 16.50(1)(b) (emphasis added).

<sup>18</sup> Ex. 9.

<sup>19</sup> Ex. 11, Captive Wildlife and Fur Farm Annual Reports 2015-2021, License Number 1824.

<sup>20</sup> Ex. 12, Captive Wildlife Quarterly Reports 2015-2021, License Number 1824.

<sup>21</sup> Ex. 12.

to Oswald’s Bear Ranch—a roadside zoo in Newberry, Michigan.<sup>22</sup> These records appear to show that the Schoebels sold or transferred three black bears without submitting a quarterly report of such transaction.<sup>23</sup>

On the 2016 annual report, the Schoebels claim that they ended the year with 17 gray fox.<sup>24</sup> However, on the 2017 annual report, the Schoebels claim they started with 16 gray fox.<sup>25</sup> This leaves one gray fox who is unaccounted for. The quarterly reports submitted in 2016 do not account for where this gray fox may have gone.<sup>26</sup> This discrepancy either reflects inaccurate annual reports or that one gray fox was transferred, sold, or died and such event was not reported on quarterly reports.

The Department has renewed the Schoebel’s licenses despite their failing to submit multiple required reports in 2016 and 2019. Under WIS. ADMIN. CODE § NR 16.50(1)(b), a license “may not be renewed” when the licensee fails without good cause to submit all required records.<sup>27</sup> Because the Schoebels have violated Wisconsin law, their renewed license appears to have been issued in error and should be revoked under WIS. STAT. § 169.45(7)(a).

b. Late Reports

In addition to failing to submit reports, the Schoebels have submitted the following reports late: all reports for 2014 and 2015,<sup>28</sup> 2016 annual report, 2016 Q1, 2016 Q2, 2018 Q3, 2019 Q3, and Q2 2021. License holders must submit quarterly reports on April 30, July 31, October 31, and January 31 each year.<sup>29</sup> The following reports were submitted late, involve transactions that were not reported on a timely basis, and are inaccurate:

<i>Late and Inaccurate Reports Submitted by the Schoebels<sup>30</sup></i>			
<b>Report</b>	<b>Date Due</b>	<b>Date Submitted/Received</b>	<b>Inaccuracies</b>
2021 Q2	July 31, 2021 <sup>31</sup>	After Oct. 6, 2021 <sup>32</sup>	Sold two lynx of unrecorded sex; did not record the date a cougar died or how her body was disposed of. <sup>33</sup>

<sup>22</sup> Ex. 13, Wisconsin Certificate of Veterinary Inspection (Apr. 15, 2019).

<sup>23</sup> Ex. 12; Ex. 13.

<sup>24</sup> Ex. 11 (the Schoebels refer to the species as *grey* fox rather than *gray* fox).

<sup>25</sup> Ex. 11.

<sup>26</sup> Ex. 12.

<sup>27</sup> WIS. ADMIN. CODE § NR 16.50(1)(b).

<sup>28</sup> Ex. 14, Memorandum from Char Robaidek, Wis. DNR to Pete Dunn, Wis. DNR, Captive Wild Animal Farm License (CWAFI) #1824 held by Mark Schoebel (Oct. 7, 2016) (“the license holder may have submitted **2014 and 2015 quarterly reports** after the end of each license year and not quarterly according to required deadlines.”) (emphasis in original).

<sup>29</sup> WIS. ADMIN. CODE § NR 16.50(1)(c)(1).

<sup>30</sup> A full list of late reports is provided in *Table 1*.

<sup>31</sup> WIS. ADMIN. CODE § NR 16.50(1)(c)(1).

<sup>32</sup> Ex. 12.

<sup>33</sup> Ex. 12.

2018 Q3	Oct. 31, 2018 <sup>34</sup>	After Nov. 29, 2018 <sup>35</sup>	Did not record the date of a black bear cub's death or how the cub's body was disposed of. <sup>36</sup>
2015 Annual Report	Jan. 31, 2016 <sup>37</sup>	Feb. 11, 2016 <sup>38</sup>	One cougar was sold or transferred who is unaccounted for in quarterly reports; <sup>39</sup> two black bears died but quarterlies only account for one of these deaths; <sup>40</sup> report fails to list the sale of four Syrian black bears. <sup>41</sup>

Nearly all of the overdue reports contain transactions for which the Schoebels were required to keep timely records. Further, several of these late reports contain inaccuracies or outright fail to record animal deaths, births, and transfers. By failing to submit accurate and timely records, it appears that the Schoebels have violated WIS. STAT. §§ 169.33(4m), 169.36(9)(b), and WIS. ADMIN. CODE § NR 16.50. Additionally, if any required record is submitted late without good cause, the person's license "may not be renewed."<sup>42</sup> The Schoebels' late records should be sufficient grounds to revoke their licenses, which appear to be issued in error.

c. Inaccurate Reports

Further, the Schoebels regularly submit records that are inaccurate or incomplete. WIS. STAT. § 169.36(1) and WIS. ADMIN. CODE § NR 16.50(1)(c)(2) require that CWAFL holders submit **correct** and **complete** records of all transactions and activities involving animals in the families *canidae*, *ursidae*, *mustelidae*, *felidae*, *suidae*, and *anatidae*.<sup>43</sup> In addition to the deficiencies noted above, the following records appear to be inaccurate in apparent violation of Wisconsin record keeping laws.<sup>44</sup>

According to the 2021 annual report, the Schoebels possessed three bobcats at the beginning of the year, sold one, and ended the year with two bobcats.<sup>45</sup> However, the Schoebels also reported to the Department that they purchased one bobcat on July 7, 2021.<sup>46</sup> Either the Schoebels inaccurately recorded the purchase of one bobcat and the 2021 annual report is incorrect or, the Schoebels inaccurately recorded the sale of one bobcat, and the quarterly report for Q3 of 2021 is inaccurate.

<sup>34</sup> WIS. ADMIN. CODE § NR 16.50(1)(c)(1).

<sup>35</sup> Ex. 15, Email from Jennifer McDonough, Wis. DNR, to Theodore Dremel, et al., Wis. DNR (Nov. 29, 2018) (indicating that the Department had not received the quarterly as of Nov. 29, 2018); This document is date stamped by the Department as being received on January 15, 2019. Ex. 12.

<sup>36</sup> Ex. 12.

<sup>37</sup> WIS. STAT. § 169.36(10)(b).

<sup>38</sup> Ex. 11.

<sup>39</sup> Ex. 14.

<sup>40</sup> Ex. 14.

<sup>41</sup> Ex. 14.

<sup>42</sup> WIS. ADMIN. CODE § NR 16.50(1)(b).

<sup>43</sup> WIS. STAT. § 169.36(1) (emphasis added); WIS. ADMIN. CODE § NR 16.50(1)(c)(2) (emphasis added).

<sup>44</sup> Table 1 provides a complete list of inaccurate and incomplete records.

<sup>45</sup> Ex. 11.

<sup>46</sup> Ex. 12.

The quarterly report for Q2 of 2020 failed to list the date, number, or species of an animal that they purchased from Bob Hudelson in Indiana.<sup>47</sup> The same report failed to list the date, sex, or age of three bobcats or even to whom they sold the animals.<sup>48</sup>

The Schoebels claim that “no activity” occurred in Q2 of 2019.<sup>49</sup> However, during this quarter, one bobcat was born and three black bears were transferred to Oswald’s Bear Ranch.<sup>50</sup> The bobcat’s birth was later communicated to the Department, but not until November 19, 2019—nearly five months after the report was submitted.<sup>51</sup> More concerning is the unreported interstate transfer of three black bear cubs to Oswald’s Bear Ranch between April 3 and April 15, 2019, which was documented on a Wisconsin CVI.<sup>52</sup> The 2019 annual report claims that five black bears were transferred; two of these bears were transferred to Gregg Woody.<sup>53</sup> This leaves three bears unaccounted for. According to the CVI, these three bears were transported to Oswald’s Bear Ranch, but this transaction was not properly reported. However, it is difficult to know how many bears were transferred in 2019, as the Schoebels never submitted the final quarterly report for the year.<sup>54</sup>

One or both of the 2019 or 2018 annual reports are inaccurate. The Schoebels claim to have ended 2018 with two badgers but begin 2019 with three badgers.<sup>55</sup> None of the documents submitted to the Department resolve this discrepancy. Therefore, at least one record is inaccurate because it fails to account for the number of badgers the Schoebels possessed from 2018-2019.

Every year since at least 2015, the Schoebels have submitted inaccurate records that fail to give an accurate account of transactions, births, and deaths at the Schoebels’ facilities. These inaccuracies impede the Department’s ability to accurately and efficiently enforce captive wildlife regulations and appear to violate WIS. STAT. § 169.36.

## II. The Schoebels’ poor record keeping of bear transactions is especially egregious.

While the Schoebels’ failure to comply with the Department’s record keeping and reporting requirements involve a variety of species, a significant proportion of these apparent violations relate to transactions involving bear cubs. Specifically, the Schoebels have repeatedly failed to submit timely and accurate reports—or failed to submit a report at all—for bear cubs who were transferred to Oswald’s Bear Ranch, a roadside zoo with a lengthy history of violating the federal Animal Welfare Act for physically abusing bears, lying to inspectors, premature cub deaths, feeding bears an inappropriate diet including restaurant scraps and dog food, and maintaining inadequate enclosures that allowed two bears to escape, one of whom was later shot and killed by local law enforcement.<sup>56</sup>

---

<sup>47</sup> Ex. 12.

<sup>48</sup> Ex. 12.

<sup>49</sup> Ex. 12.

<sup>50</sup> Ex. 16, Email from Alice Schoebel to Jennifer McDonough, Wis. DNR, 3rd Qt 1824 (Nov. 19, 2019); Ex. 13.

<sup>51</sup> Ex. 16.

<sup>52</sup> Ex. 13.

<sup>53</sup> Ex. 11; Ex. 12.

<sup>54</sup> Ex. 9.

<sup>55</sup> Ex. 11.

<sup>56</sup> Ex 17, PETA, Oswald’s Bear Ranch Fact Sheet (2022).

According to records obtained from the Department by PETA, at least two transactions involving Oswald's Bear Ranch have triggered Department investigations.<sup>57</sup>

The Schoebels failed to submit a quarterly report for Q1 and Q2 of 2016 on time.<sup>58</sup> These quarterly reports were due on April 30 and July 31, 2016 respectively.<sup>59</sup> However, the Schoebels did not submit these reports until February 14, 2017.<sup>60</sup> During this time, Mark Schoebel was caught transporting bears to Oswald's Bear Ranch without disclosing this transaction to the Department.<sup>61</sup> The Department was only made aware of this transaction when a Michigan state trooper reached out to the Department stating, "[a] trooper stopped a guy bringing two live cubs to a bear ranch up here. Our 'ranch' has been illegally importing from around the Midwest for many years."<sup>62</sup> While the Schoebels reported transferring four black bears to Oswald's, these two bears were never disclosed to the Department.<sup>63</sup> Further, only one of these bears has a known origin. The 2015 annual report claims that two black bears died in 2015, ending the year with only one black bear.<sup>64</sup> However, quarterlies only account for one black bear death, not two.<sup>65</sup> When Michigan police stopped Mark Schoebel, he should have only had one bear in his possession—as indicated on the annual report.<sup>66</sup>

In May 2019, the Schoebels again failed to keep and submit accurate records of transactions involving bears. The Schoebels claim to begin 2019 with two black bears, purchasing three black bears, and selling five black bears.<sup>67</sup> However, quarterly reports only account for the sale of two bears.<sup>68</sup> The three bears were likely transferred to Oswald's Bear Ranch, as indicated by an April 15, 2019 CVI.<sup>69</sup>

Despite repeated directions from the Department to comply with recordkeeping requirements, the Schoebels have continued to file late and incomplete reports or fail to file required reports entirely.

### III. The Schoebels failed to report the possession of lynx and fox and related transactions.

WIS. STAT. § 169.36(9)(b) requires license holders to submit quarterly reports "if the transaction or activity involved any live wild animal of the family *canidae*, *ursidae*, *mustelidae*, or *felidae*, or any harmful wild animal."<sup>70</sup> Because the Department has chosen to focus its enforcement priorities on native animals, the department specifically requires that licensees submit "complete records of all transactions or activity involving any captive wild animals of the famil[y] [. . .] *Felidae* (bobcat, **lynx**,

---

<sup>57</sup> Ex. 14, Ex. 18, Memorandum from Jennifer McDonough and Char Robaidek, Wis. DNR to Pete Dunn, Wis. DNR, Captive Wild Animal Farm License (CWAFL) #1824 held by Matt Schoebel (R-Zoo /Animal Entertainment) (Aug. 31, 2018).

<sup>58</sup> Ex. 12.

<sup>59</sup> WIS. ADMIN. CODE § NR 16.50(1)(c)(1).

<sup>60</sup> Ex. 12.

<sup>61</sup> Ex. 14.

<sup>62</sup> Ex. 19, Email from Detective Reid Roeske, Mich. DNR to John Welke, Wis. DNR (May 13, 2016).

<sup>63</sup> Ex. 20, Email from Peter Dunn, Wis. DNR to Michael Green, Wis. DNR (Oct. 10, 2016) (Referring to Mark Schoebel, "he never indicated having exported those Bears on his documentation to the department.").

<sup>64</sup> Ex. 11.

<sup>65</sup> Ex. 12.

<sup>66</sup> This bear is not accounted for in the quarterly reports for 2016. Ex. 12.

<sup>67</sup> Ex. 11.

<sup>68</sup> Ex. 12.

<sup>69</sup> Ex. 13.

<sup>70</sup> WIS. STAT. § 169.36(9)(b).

cougars).”<sup>71</sup> There are four species of lynx: Canada lynx (*Lynx canadensis*), bobcats (*Lynx rufus*), Eurasian lynx (*Lynx lynx*), and Iberian lynx (*Lynx pardinus*).<sup>72</sup> The Department specifically requires recording transactions involving bobcats (*Lynx rufus*), but does not further limit the interpretation of “lynx” to preclude the other three species.<sup>73</sup> Further, the Department has previously interpreted regulations that apply to general animal classifications to equally apply to animals which fall into that category—even if those animals are not native to Wisconsin. For example, the Department informally interpreted the term “wild strains of swine,” a general classification of animals within the family *suidae*, to encompass African warthogs, as well as other species of African pigs like red river hogs, bush pigs, and forest hogs.<sup>74</sup> Similarly, because the term “lynx” is not further specified by the Department, its regulations, or state statutes, it follows that all species of lynx should be considered “lynx” for purposes of regulation and record keeping. Accordingly, licensees should have to report all transactions involving *any* species of lynx.

The Schoebels have submitted records—albeit inconsistently and often inaccurate—regarding Canada lynx and bobcats. However, the Schoebels have possessed and exhibited northern lynx (*L. l. lynx*), a subspecies of Eurasian lynx (*Lynx lynx*) for years without disclosing such to the Department.<sup>75</sup> Further, it appears that the Schoebels have been engaging in transactions involving northern lynx without disclosing such in quarterly reports. Based on inventories taken during USDA inspections, the Schoebels have owned as many as four northern lynx at between 2014 and 2021, suggesting that the Schoebels have purchased, propagated, sold or otherwise transferred northern lynx without recording it.

On May 2, 2018, Nov. 13, 2018, and April 30, 2019, USDA records indicate that Alice Schoebel possessed at least one northern lynx.<sup>76</sup> The USDA inventories of northern lynx at Animal Entertainments, owned by the Schoebels, is as follows:

<i>Animal Entertainments-Cert. No. 35-C-0367</i> <sup>77</sup>	
<b>Date of USDA Inspection</b>	<b>Number of Northern Lynx</b>
Aug. 25, 2021	2
Aug. 22, 2019	4
July 26, 2018	3
Aug. 22, 2017	2
May. 14, 2015	2
Dec. 03, 2014	2

Similarly, the Schoebels have failed to report the possession of fox species other than gray fox and other transactions involving these animals. Department regulations require reporting transactions involving animals in the family “*Canidae* (coyotes, **foxes**, wolves and wolf-dog hybrids).”<sup>78</sup> Much like

<sup>71</sup> WIS. ADMIN. CODE NR § 16.50(c)(2)(d) (emphasis added).

<sup>72</sup> *Lynx*, ENCYCLOPEDIA BRITANNICA, <https://www.britannica.com/animal/lynx-mammal> (last visited Nov. 1, 2022).

<sup>73</sup> WIS. DEPT OF NAT. RES., CAPTIVE WILD ANIMAL FARM REGULATIONS, PUB-CS-17 (Mar. 2016), <https://dnr.wi.gov/files/pdf/pubs/cs/CS0017.pdf>.

<sup>74</sup> Ex. 21, Email from Julie McGwin, Wis. DATCP to Peter Dunn et al., Wis. DNR (Jan 8, 2020).

<sup>75</sup> Ex. 22, U.S. Dep’t of Agric., Inspection Reports for Cert. No. 35-B-0222; Ex. 23, U.S. Dep’t of Agric., Inspection Reports for Cert. No. 35-C-0367.

<sup>76</sup> Ex. 22.

<sup>77</sup> Ex. 23.

<sup>78</sup> WIS. ADMIN. CODE NR § 16.50(c)(2)(a) (emphasis added).



with “wild strains of swine” and “lynx,” the classification “fox” contains multiple species. Accordingly, transactions involving any fox species should be reported to the agency. Because red fox (*Vulpes vulpes*) are native to Wisconsin, they should be a priority for the Department.<sup>79</sup> According to inventories taken during USDA inspections, the Schoebels possessed and exhibited the following foxes between 2014-2018:

<i>Animal Entertainments: Cert. No. 35-C-0367</i> <sup>80</sup>		
<b>Date of USDA Inspection</b>	<b>Fox Species Inventoried</b>	<b>Number of Individuals</b>
July 26, 2018	Fennec fox ( <i>Vulpes zerda</i> )	2
	Arctic fox ( <i>Vulpes lagopus</i> )	4
Aug 22, 2017	Fennec fox ( <i>Vulpes zerda</i> )	2
	Arctic fox ( <i>Vulpes lagopus</i> )	2
	Red fox ( <i>Vulpes vulpes</i> )	4
May 14, 2015	Fennec fox ( <i>Vulpes zerda</i> )	2
	Arctic fox ( <i>Vulpes lagopus</i> )	2
Dec 03, 2014	Fennec fox ( <i>Vulpes zerda</i> )	2

The Schoebels have not provided the Department with a complete record of their possession or trade of lynx and fox. Wisconsin record-keeping laws clearly require CWAFI holders to keep a correct and complete record of transactions involving wild animals in the families *Canidae* and *Felidae*, to which northern lynx and all fox species belong.<sup>81</sup> Further, those records must be submitted to the Department on a quarterly basis.<sup>82</sup> WIS. STAT. § 169.33(4m) states that “no person may fail to keep records or submit reports as required under this chapter.”<sup>83</sup> It appears that the Schoebels have not submitted reports required by statute, in violation of Wisconsin law. Accordingly, the Department should revoke the Schoebels’ licenses, as permitted under WIS. STAT. § 169.45(7).

#### IV. Conclusion

Since at least 2015, the Schoebels have regularly failed to submit required reports—or submitted reports late, incomplete, and with inaccurate information. The record keeping laws require very little of licensees. Yet, the Schoebels are apparently unwilling or unable to meet these minimal requirements despite the Department’s multiple attempts to bring them into compliance. The Schoebel’s frequent and repeated failure to submit complete, accurate, and timely records renders the records useless. Accordingly, PETA respectfully requests that the Department investigate the Schoebels and hold them fully accountable, including by revoking their licenses.

<sup>79</sup> *Furbearers*, WIS. DEP’T OF NAT. RES., <https://dnr.wisconsin.gov/topic/WildlifeHabitat/furbearers.html> (last visited Nov. 1, 2022).

<sup>80</sup> Ex. 23.

<sup>81</sup> WIS. STAT. § 169.36(1),(9)(b).

<sup>82</sup> *Id.*

<sup>83</sup> WIS. STAT. § 169.33(4m).

Table 1: Table of Missing, Late, Inaccurate, and Incomplete Reports

Report	Missing	Date Received	Days late	Inaccurate or Incomplete
2015 Q1 <sup>1</sup>		LATE- Feb. 11, 2016	287	
2015 Q2 <sup>2</sup>		LATE- Feb. 11, 2016	195	
2015 Q3 <sup>3</sup>		LATE- Feb. 11, 2016	103	
2015 Q4 <sup>4</sup>		LATE- Feb. 11, 2016	11	
2015 Annual <sup>5</sup>		LATE- Feb. 11, 2016	11	Cougar sale unaccounted for in quarterlies; missing black bear death; missing the sale of four Syrian black bears
2016 Q1 <sup>6</sup>		LATE- Not received until after Oct. 7, 2016.	>160	
2016 Q2 <sup>7</sup>		LATE- Not received until after Oct. 7, 2016	>68	Does not disclose May 13 transfer of two black bears to Oswald's Bear Ranch
2016 Q3	<b>MISSING</b> <sup>8</sup>			
2016 Q4	<b>MISSING</b> <sup>9</sup>			
2016 Annual <sup>10</sup>		LATE- Not received until Feb 14, 2017	14	Report lists 17 gray fox at the end of the year but 16 gray fox at the beginning of the next year. One fox is unaccounted for.
2017 Q1 <sup>11</sup>				Omits the death of one bobcat
2017 Q2 <sup>12</sup>				Omits date that a badger was purchased
2017 Q3 <sup>13</sup>				Omits the death of two gray fox and one skunk
2017 Annual <sup>14</sup>				One bobcat is unaccounted for; report lists 16 gray fox at the beginning of the year but 17 gray fox at the end of the prior year. One fox is unaccounted for.
2018 Q2 <sup>15</sup>				Omits the date that a fisher died;
2018 Q3 <sup>16</sup>		LATE- Received Jan 15, 2019	76	Date of a bear cub's death is unrecorded
2018 Annual <sup>17</sup>				Ends the year with two badgers but begins 2019 with three badgers.
2019 Q2 <sup>18</sup>				Claims "no activity" but CVI shows three bears transferred to Oswald's Bear Ranch; omitted the birth of a bobcat
2019 Q3 <sup>19</sup>		LATE- November 15, 2019	15	
2019 Q4	<b>MISSING</b> <sup>20</sup>			

2019 Annual <sup>21</sup>				Three black bears were sold who are unaccounted for in quarterly reports; missing address; begins year with three badgers while claiming to end 2018 with only two badgers.
2020 Q2 <sup>22</sup>				Unrecorded number and species of animals purchased from Bob Hudelson; three bobcats of undisclosed age and sex sold to unknown buyer
2020 Annual <sup>23</sup>				Does not account for the undisclosed animals purchased in Q2 2020
2021 Q2 <sup>24</sup>		LATE- received after Oct. 6, 2021	>67	Date of a cougar's death is not recorded
2021 Q3 <sup>25</sup>				Missing submission date
2021 Annual <sup>26</sup>				Does not account for the purchase of a bobcat in Q3 in 2021
2022 Q1	<b>MISSING</b> <sup>27</sup>			
2022 Q2	<b>MISSING</b> <sup>28</sup>			

---

<sup>1</sup> Ex. 12.

<sup>2</sup> Ex. 12.

<sup>3</sup> Ex. 12.

<sup>4</sup> Ex. 12.

<sup>5</sup> Ex. 11.

<sup>6</sup> Ex. 12.

<sup>7</sup> Ex. 12.

<sup>8</sup> Ex. 9.

<sup>9</sup> Ex. 9.

<sup>10</sup> Ex. 11.

<sup>11</sup> Ex. 12.

<sup>12</sup> Ex. 12.

<sup>13</sup> Ex. 12.

<sup>14</sup> Ex. 11.

<sup>15</sup> Ex. 12.

<sup>16</sup> Ex. 12.

<sup>17</sup> Ex. 11.

<sup>18</sup> Ex. 12.

<sup>19</sup> Ex. 12.

<sup>20</sup> Ex. 9.

<sup>21</sup> Ex. 11.

<sup>22</sup> Ex. 12.

<sup>23</sup> Ex. 11.

<sup>24</sup> Ex. 12.

<sup>25</sup> Ex. 12.

<sup>26</sup> Ex. 11.

<sup>27</sup> Ex. 10.

<sup>28</sup> Ex. 10.