

April 5, 2023

Sgt. Dan Greuel, District 11 Sergeant  
Illinois Department of Natural Resources  
[REDACTED]

Eric Mieure, Conservation Police Officer  
Illinois Department of Natural Resources  
[REDACTED]

**Via email**

Re: Thomas Edmonds Apparent Illegal Possession of Dangerous Wild  
Animals

Dear Sgt. Greuel and CPO Mieure:

I am writing on behalf of PETA to request that the Illinois Department of Natural Resources (IDNR) exercise its authority to confiscate several dangerous animals from Thomas Edmonds ([REDACTED]), a private individual who no longer holds a valid federal license from the United States Department of Agriculture (USDA).

Illinois state law prohibits the personal possession of tigers, mountain lions, lynx, and primates. 720 Ill. Comp. Stat. 5/48-10. One of the exemptions to that prohibition is for federally licensed exhibits. *Id.* On December 9, 2021, when Edmonds' federal Animal Welfare Act (AWA) license was canceled, he no longer qualified for that exemption and thus, could not legally possess these dangerous wild animals in the state of Illinois.<sup>1</sup> On December 19, 2022, PETA alerted IDNR to Edmonds' apparent illegal possession of tigers, mountain lions, lynx, and primates, and requested that the agency exercise its authority to confiscate these dangerous wild animals. Ex. A (PETA Complaint). When IDNR investigated, Edmonds told officials that legal "ownership" of these animals had been transferred to another individual who did have an AWA license: Andy Watkins (licensed under WY Reptiles and Exotics, LLC, license no. 32-C-0281). Ex. B (IDNR Field Report No. 2022-03-482-005). To support this assertion, Edmonds provided IDNR with APHIS Form 7020 listing that two tigers, two cougars, three Siberian lynx, three snow macaques, four ringtail lemurs, two albifron lemurs, and two common marmosets were transferred to Andy Watkins on March 26, 2022. Ex. C (APHIS Form 7020). IDNR accepted this form as fact, and in January 2023 told PETA this prevented the agency from taking action. In response, PETA provided supplemental information to IDNR documenting that Edmonds was still the legal owner of the property where the animals lived, and that there were no active AWA licenses for anyone in West Union Illinois. Ex. D. It does not appear that IDNR has done anything further to address this issue.

<sup>1</sup>The USDA has also [initiated an enforcement proceeding](#) against Edmonds, which could terminate his federal licensing privileges permanently.

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The APHIS Form 7020 that Edmonds provided to IDNR does not legalize his continued possession of tigers, mountain lions, lynx, and primates. For one, state law prohibits a person from “act[ing] as custodian of or maintain[ing] in his or her possession any dangerous animal or primate[.]” 720 Ill. Comp. Stat. 5/48-10(b). This prohibits *possession* regardless of legal “ownership.” As of December 2022—nine months after these animals were allegedly transferred—most of these animals were documented in Edmonds possession. *See* Video 1 (Dec. 4, 2022, public tour of Walnut Prairie Wildside) at 40:25 (Edmonds states “most of my primates [are] put in for the winter”); at 45:26 (two tigers); at 1:07:16 (a marmoset); at 1:09:54 (two mountain lions); at 1:13:39 (a Siberian lynx); at 1:21:44 (three snow macaques). As long as Edmonds continues to possess dangerous animals and primates at his personal residence, IDNR has the jurisdiction, authority, and duty to remedy this apparent violation of 720 Ill. Comp. Stat. 5/48-10(b).

Even if Andy Watkins is the legal “owner” of the tigers, mountain lions, lynx, and primates at Edmonds’ personal residence, Watkins would not be exempt from the prohibition in 720 Ill. Comp. Stat. 5/48-10(b) because his AWA license does not cover Edmonds’ property. AWA licenses are issued to specific persons authorizing those individuals to conduct specific activity **at a specific location**. 9 C.F.R. § 2.1(b)(1). Andy Watkins has an AWA license for *one* location in Columbus Indiana, and the most recent USDA inspection report from that facility lists no animals on its inventory. Ex. E (March 9, 2022 Inspection Report). Andy Watkins’ AWA license does not allow him to keep dangerous animals and primates at Edmonds’ property. If the APHIS Form 7020 Edmonds submitted to IDNR was accurate, then Watkins is operating in apparent violation of the AWA. Ex. F (PETA’s USDA Complaint on Andy Watkins).

Not only are the allegedly transferred animals still in Edmonds possession—which itself is a violation of state law that IDNR can act on—but Edmonds has continued to refer to these animals as “his”:

It effects all big cats, so like for me it effects my tigers, the mountains lions I got, and also the Siberian lynx. . . I’ve had my big cats . . . since 2015, so seven years for some of mine so if I can’t get my license renewed then within a 180 days after Biden signs [the Big Cat Public Safety Act] then I have to find a place for an animal that I’ve had for 7 years in my care . . . it’s a beloved pet it’s a baby. . . I’m all those cats know, so its going to be a very heartbreaking day if I can’t get everything renewed on my side.

*See* Video 2 at 9:30-10:20 (Dec. 8, 2022); *see also id.* at 13:04-13:30 (Edmonds stating “I’ve got two male mountain lions”). Edmonds knows that without an AWA license he cannot keep dangerous wild animals and primates at his personal residence. *See* Video 1 at 1:58:34 (Edmonds stating “Illinois is already against private ownership of cats so its gonna be tough for me. . . I got a battle on my end”). In light of these statements, combined with Edmonds continued possession of the animals at issue, it strongly appears that the APHIS Form 7020 provided to IDNR was fraudulently submitted in an effort to circumvent state law.

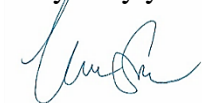
Edmonds lost his federal AWA license after the USDA cited him repeatedly for the dangerous handling of tigers and mountain lions, which demonstrated his lack of experience and knowledge with these apex predators. Ex. G (“There have been many dangerous incidents, documented in previous inspection reports that prove a lack of necessary knowledge and experience . . . Lack of the required knowledge/experience is dangerous”). During a December 2022 public tour of his facility, Edmonds reckless behavior was once

again on display. He entered the enclosure confining two adult tigers (Tony and Lilly) and engaged in dangerous direct physical contact with these two animals while his young daughter ran around outside the enclosure with a dog, which Edmonds explained was agitating the tigers. *See* Video 1 at 46:50-50:00. Edmonds also told these visitors that when he's "gone working" his kids "do a lot of the feeding for" him. *Id.* at 1:44:00-1:45:00.

This situation is a powder keg, which is why IDNR needs to act now before an accident happens. A possibly fraudulent piece of paper that claims to transfer legal ownership of animals still in Edmonds possession is nothing more than an excuse not to enforce the law. Edmonds appears to be possessing dangerous wild animals and primates in violation of state law, and PETA urges IDNR to exercise its authority to confiscate these animals in order to protect the safety of both the public and the animals themselves. *See* 720 Ill. Comp. Stat. Ann. 5/48-10(f). PETA stands ready to refer your agency to appropriate, experienced, and accredited facilities that could assist in seizure, transport, and temporary/permanent placement.

Thank you for your attention to this important matter. I look forward to hearing from you.

Very truly yours,



Michelle Sinnott, Esq.  
Director, Captive Animal Law Enforcement

