

April 5, 2023

Robert M. Gibbens, D.V.M.
Director, Animal Welfare Operations
USDA-APHIS-Animal Care

Via e-mail: [REDACTED]

Re: Request to Investigate Apparent Animal Welfare Act Violations by
WY Reptiles and Exotics LLC (License No. 32-C-0281)

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Andy Watkins licensed under WY Reptiles and Exotics, LLC (license no. 32-C-0281) for either operating a second unapproved site at Thomas Edmonds' facility (cancelled license no. 33-B-0435), or helping to create false records in an apparent attempt to assist Edmonds circumvention of Illinois state law.

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.¹ In April 2022, when the Illinois Department of Natural Resources (IDNR) investigated Edmonds for his apparent illegal possession of these dangerous wild animals, Edmonds told state officials that legal "ownership" of these animals had been transferred to another individual who did have an AWA license: Andy Watkins (license no. 32-C-0281). Ex. A (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 WY Reptiles and Exotics on March 26, 2022. Ex. B (APHIS Form 7020). As of December 2022—nine months after these animals were allegedly transferred—most of these animals were documented in Edmonds possession at his unlicensed facility in Illinois. *See* Video 1 (Dec. 4, 2022, public tour of Walnut Prairie Wildside)² 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).

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). Licensees are

¹ The USDA has also [initiated an enforcement proceeding](#) (AWA Docket No. 22-J-0027), which could terminate Edmonds licensing privileges permanently.

² On December 14, 2022, PETA submitted a complaint to the USDA over Edmonds unlicensed exhibiting during this public tour of his facility.

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required to notify the USDA and obtain a new license “before any change in the name, address, substantial control or ownership of [the] business or operation, locations, activities, and number or type of animals.” *Id.* According to the [USDA’s Animal Welfare Inspection Guide](#) (Inspection Guide), if an existing licensee wishes to conduct regulated activity at another location, it must add a new site to its existing license and get approval from the USDA. *See* Inspection Guide at Sec. 4.15. WY Reptiles and Exotics 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. C (March 9, 2022 Inspection Report). If the APHIS Form 7020 Edmonds submitted to state wildlife officials was accurate, then it appears that animals transferred to WY Reptiles and Exotics are being maintained at an unapproved site in violation of the AWA.

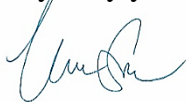
Given that the allegedly transferred animals are still in Edmonds possession and that he has continued to refer to these animals as “his” (*see* Video 2 at 9:30), the accuracy of the APHIS Form 7020 he submitted to IDNR is questionable. In all likelihood, Edmonds provided this document to state wildlife officials because in order to keep the tigers, mountain lions, lynx, and primates in his possession, he needed an AWA license. If WY Reptiles and Exotics allowed its AWA license to be used in this way, it has helped create a false record in an apparent attempt to assist Edmonds circumvention of state law in violation of 9 C.F.R. § 2.11(a)(6) and (7).

Either WY Reptiles and Exotics is maintaining animals at an unapproved site or it has helped create false records regarding the transfer of animals in order to assist in the apparent circumvention of state law. Both of which are violations of the AWA.

Please investigate WY Reptiles and Exotics to determine the veracity of the APHIS Form 7020 submitted to Illinois state wildlife officials. Please hold WY Reptiles and Exotics fully accountable for any and all violations you find, and communicate those findings to state wildlife officials.

Thank you for your attention to this important matter. Please inform me of the complaint number that your agency assigns to this correspondence.

Very truly yours,



Michelle Sinnott, Esq.
Director, Captive Animal Law Enforcement

