

November 02, 2023

Kevin Shea
Administrator
USDA-APHIS

Via e-mail: [REDACTED] animalcare@usda.gov

**Re: Request to Terminate Bhagavan Antle and China York's
Animal Welfare Act Licenses**

Dear Administrator Shea:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) terminate Bhagavan Antle's (AWA License No. 56-C-0116) and China York's (AWA License No. 56-C-0280) AWA licenses for felony violations of Virginia endangered species laws and circumvention of USDA regulations, respectively, such that Antle and York are unfit to hold an AWA license and their continued licensure would be contrary to the purposes of the AWA.

AWA regulations state that a "license will not be issued to any applicant who . . . has been found to have violated any Federal, State, or local laws or regulations pertaining to the transportation, ownership, neglect, or welfare of animals, or is otherwise unfit to be licensed" or "would be operating in violation or circumvention of any Federal, State, or local laws." 9 C.F.R. §§ 2.11(a)(6), (7). The USDA may terminate a license "for any reason that a license application may be denied." 9 C.F.R. § 2.12.

As further detailed in the attached appendix, on June 16, 2023, a jury in Frederick County Circuit Court found Bhagavan Antle guilty of four felony violations of Virginia law: two counts of buying an endangered species and two counts of conspiring to buy and sell endangered species, stemming from Antle's purchase of lion cubs from a Virginia roadside zoo.¹ These felony convictions disqualify Antle from holding an AWA license. In an apparent attempt to pre-emptively circumvent the AWA's prohibition of licensure of any person who has violated state laws pertaining to the transportation and ownership of animals, York formed Sugriva Co LLC and was granted an AWA license while the charges for which Antle was ultimately convicted were pending. Evidence indicates that there is no meaningful or practical distinction between Antle and York's licenses, such that Antle is conducting business as usual despite his apparent disqualification from licensure.

¹ Ex. 1, Conviction Order, *Virginia v. Antle*, Case Nos. CR 20-818—828, 830, 898—899, CR 22-509—510 (Va. Circ. Ct. Aug. 07, 2023), at ¶¶ 7-8.

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- PETA Netherlands
- PETA Foundation (U.K.)

Accordingly, PETA requests that the USDA: (1) terminate Antle's license for violations of Virginia law pertaining to the transportation and ownership of animals; (2) terminate Sugriva Co LLC's license for apparent attempts to circumvent USDA regulations; and deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS.

Thank you for your time and attention to this important matter.

Respectfully,



Cydnee Bence
Counsel, Captive Animal Law Enforcement
PETA Foundation



Appendix

I. Introduction

Bhagavan Antle (AWA License No. 56-C-0116) (a.k.a. “Doc Antle”) exhibits animals at “Doc Antle’s Myrtle Beach Safari” (“MBS”) through his LLC, The Institute for Greatly Endangered and Rare Species (“T.I.G.E.R.S.”).² Antle is also the organizer of “Preservation Station” (d.b.a. “Rare Species Fund”), a nonprofit corporation.³ China York, Antle’s romantic partner, exhibits animals at MBS through Sugriva Co LLC (AWA License No. 56-C-0280) (“Sugriva”). York is also a managing member of “Preservation Station” and publicly listed as an employee of MBS.⁴

II. Bhagavan Antle is disqualified from holding an AWA license by being found guilty of violating state laws pertaining to the transportation and ownership of animals.

On June 16, 2023, a jury in Frederick County Circuit Court found Antle guilty of four felony violations of Virginia law: two counts of buying an endangered species and two counts of conspiring to buy and sell endangered species.⁵ Antle was sentenced to two years of imprisonment for each of the four felonies, which were suspended, five years of probation, and a total of \$10,000 in fines. As part of his sentence, Antle is prohibited from working with, owning, possessing, brokering, buying, trading, transferring, selling or donating state-regulated wildlife in Virginia for five years.⁶

On June 29, 2022, Antle was also federally indicted for:

- Violating the Lacey Act (16 U.S.C. §§ 3372(a)(1), 3373(d)(1)(B)) by engaging in conduct involving the sale and purchase of, offer of sale and purchase of, and intent to sell and purchase red ruffed lemurs, an endangered species, in excess of \$350.00;
- Three counts of violating the Endangered Species Act (16 U.S.C. §§ 1538(a)(1)(E)-(F), 1540(b)(1)) by transporting endangered species in interstate commerce including two red ruffed lemurs, two juvenile cheetahs, and a juvenile chimpanzee;
- Two counts of violating the Lacey Act (16 U.S.C. §§ 3372(d)(2), 3373(d)(3)(A)(ii)) by making a false record of two juvenile cheetahs who were transported in interstate commerce and making a false record of a juvenile chimpanzee who was transported in interstate commerce;
- Money laundering in violation of 18 U.S.C. §§ 1956(a)(3)(A), (B); and conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h).⁷

² Ex. 2, T.I.G.E.R.S., Amended Articles of Organization, South Carolina Secretary of State (Feb. 14, 2011).

³ Ex. 3, Preservation Station, Inc., d.b.a. Rare Species Fund, Form 990 (2020). Preservation Station/Rare Species Fund is suspended in Florida and South Carolina.

⁴ Ex. 3; Ex. 4, *Meet the Caretakers*, DOC ANTLE’S MYRTLE BEACH SAFARI, <https://myrtlebeachsafarifacts.com/> (last visited Oct. 23, 2023).

⁵ Ex. 1, at ¶¶ 7-8.

⁶ Press Release, Office of the Attorney General, Commonwealth of Virginia, “Tiger King” Star Doc Antle Sentenced, Banned from Dealing Exotic Animals in Virginia (Oct. 3, 2023), <https://www.oag.state.va.us/media-center/news-releases/2617-october-3-2023-tiger-king-star-doc-antle-sentenced-banned-from-dealing-exotic-animals-in-virginia>.

⁷ Ex. 5, Indictment, U.S. v. Antle, No. 4:22-cr-00580 (D. S.C. June 28, 2022).

While Antle has not yet been tried for these offenses, Antle’s coconspirator, codefendant, and MBS employee, Meredith “Moksha” Bybee, has already pled guilty to violating the Endangered Species Act by knowingly delivering, receiving, carrying, transporting and shipping two juvenile cheetahs, an endangered species.⁸

Under AWA regulations, the USDA may terminate a license if the licensee “has been found to have violated any Federal, State, or local laws or regulations pertaining to the transportation, ownership, neglect, or welfare of animals.” 9 C.F.R. §§ 2.11(a)(7), 2.12. These four felonies are violations of state law pertaining to the transportation and ownership of animals such that Antle is disqualified from holding an AWA license.

Accordingly, PETA requests that the USDA immediately terminate Antle’s AWA license for multiple felony violations of Virginia law pertaining to the transportation and ownership of animals. His felony convictions make him unfit to hold an AWA license and his continued licensure is contrary to the purposes of the Act.

III. Sugriva’s license is an apparent attempt to circumvent USDA regulations.

Under AWA regulations, the USDA may terminate a license if the licensee “is or would be operating in violation of circumvention of any Federal, State, or local laws.” 9 C.F.R. §§ 2.11(a)(6), 2.12. Following his felony conviction and sentencing, Antle is disqualified from holding an AWA license and operating as an exhibitor would be contrary to the AWA. York’s licensure is an apparent attempt to circumvent AWA regulations that disqualify Antle from licensure, allowing Antle to continue business as usual. These attempts to circumvent AWA regulations render York unfit to hold an AWA license such that her licensure is contrary to the purposes of the Act.

Antle and York’s licenses are as, if not more, closely associated than in other cases where the USDA has found circumvention. For example, in *In Re Dakota Hammonds*,⁹ the USDA denied the petitioner’s AWA license application as circumvention of an AWA license termination. Jimmy Hammonds’, the petitioner’s father, had his AWA license terminated after he was “found to have violated the Lacey Act, the Endangered Species Act (“ESA”), both federal laws, and State, or local laws or regulations all pertaining to the transportation, ownership or welfare of animals.”¹⁰ In denying the petitioner’s application, the USDA relied on evidence that: (1) the applicant had the same site address and phone number associated with the terminated license; (2) the applicant was previously listed as an officer or agent of Jimmy Hammonds’ business; and, (3) Jimmy Hammond was listed as an officer or agent of a business with which the applicant was associated.¹¹ The applicant argued that he removed himself from Jimmy Hammonds’ business and had his own animals who he intended to use for regulated activities. The USDA ALJ found this unpersuasive and upheld the denial.

York uses addresses and a phone number in USDA communications regarding Sugriva that are each associated with Antle. York is also an officer or agent of Antle’s businesses and non-profit

⁸ Ex. 5; Ex. 6, Guilty Plea, U.S. v. Bybee, No. 4:22-cr-00580-JD-3 (July 14, 2022).

⁹ Decision and Order on Summary Judgement, AWA-D Docket No. 23-J-0031 (July 20, 2023).

¹⁰ Consent Decision and Order, In re: Hammonds, AWA Docket No. 23-J0007 (Dec. 21, 2022).

¹¹ Ex. 7, Letter from Elizabeth Theodorson, DVM, Assistant Deputy Administrator, Animal Care, APHIS, to Dakota Hammonds (Jan. 25, 2023).

corporations. York is also closely associated with officers and agents of Antle’s businesses. Further, Antle has continuously intertwined himself with Sugriva’s license at every step of the process.

First, York uses a phone number and addresses in communications with the USDA, including Sugriva’s license application, that are associated with Antle:

- The address listed on Sugriva’s license (P.O. Box 31210, Myrtle Beach, SC 29588) is the same address used by Antle on his AWA license;¹²
- The address listed on Sugriva’s application as York’s personal permanent mailing address and the location of an additional site (6000 SW 118th Ave., Miami, FL 31210) is owned by Antle;¹³
- The address to which Sugriva Co LLC is registered (851 Folly Ranch Ln., Myrtle Beach, SC 29588) is the same as that publicly listed for “Doc Antle’s Myrtle Beach Safari” and the physical address associated with Antle’s AWA license;¹⁴
- York’s phone number ((843) 333-4118), which she provided to the USDA in correspondence regarding Sugriva Co LLC’s license, is the same phone number used for Antle’s “Rare Species Fund.”¹⁵

The basic contact information York provided to the USDA and in Sugriva Co. LLC’s license materials is often identical to that of Antle’s, including contact information regarding his AWA license.

Second, York and Antle both serve as managing members or agents of the same businesses:

- “Preservation Station, Inc.,” d/b/a/ “Rare Species Fund,” is a non-profit corporation registered to Antle.¹⁶ As early as 2007, Internal Revenue Service 990s for Preservation Station list Antle as a President and York as a Secretary or Director.¹⁷ Preservation Station is registered to 6000 SW 118th Ave., Miami, FL 31210, the same address used by York on Sugriva’s AWA license application and Antle’s current property;¹⁸
- Antle and York are both listed as organizers of Sunset Penthouse LLC.¹⁹ Sunset Penthouse LLC is registered to 927 Folly Rd., Myrtle Beach, SC 29588, which York also lists as her

¹² Ex. 8, Bhagavan Antle, USDA Inspection Report (May 24, 2023); Ex. 9, Sugriva Co LLC, Application for License (June 17, 2023) (listing P.O. Box 31210, Myrtle Beach, SC 29588 as Sugriva Co LLC’s mailing address).

¹³ Ex. 9, Sugriva Co LLC, Application for License (June 17, 2023) (York lists this address as her personal permanent mailing address and the location of an additional site, which was later removed from her license); Ex. 10, Office of the Property Appraiser, Summary Report for 6000 SW 118 Ave., Miami, FL 33183-1728 (Oct. 24, 2023) (listing Bhagavan Antle as the owner of the property).

¹⁴ Ex. 11, USDA Report of Investigation, Case No. SC10003-AC, T.I.G.E.R.S. LLC & Bhagavan Antle (May 14, 2021) (listing 851 Folly Ranch Lane, Myrtle Beach, SC 29588 as the contact information for T.I.G.E.R.S. and Antle); Ex. 9 (listing the 851 Folly Ranch Lane address as Sugriva Co LLC’s physical address for exhibition).

¹⁵ Ex. 12, Email from China York to APHIS Animal Care, Updated Payment for Sugriva Co License (Oct. 19, 2022); Ex. 13, *Rare Species Fund*, FACEBOOK, <https://www.facebook.com/RareSpeciesFund/about> (last visited Oct. 24, 2023).

¹⁶ Ex. 3 (listing Bhagavan Antle as President).

¹⁷ Ex. 14, Zooville USDA F/K/A/ The Preservation Station, Inc., Form 990-EZ (2007).

¹⁸ Ex. 3; *supra* note 13.

¹⁹ Ex. 15, Sunset Penthouse LLC, Articles of Organization (Sept. 8, 2021).

address as an agent of the LLC. Antle, the only other agent of Sunset Penthouse LLC, owns the 927 Folly Rd. property.²⁰

Third, York and Antle's businesses share a small circle of associates, including Antle's children and romantic partners:

- **Kodi Antle:** York and Kodi Antle (Bhagavan Antle's son) are both managers of Vali Co., LLC, the initial LLC York apparently intended to use for the Sugriva license.²¹ Kodi Antle and York are also listed as employees of MBS and managing members of Preservation Station.²²
- **Moksha Bybee:** Bybee is an employee of MBS.²³ She is a codefendant and coconspirator to Antle's alleged violations of federal law, pleading guilty to knowingly delivering, receiving, carrying, transporting and shipping two juvenile cheetahs, an endangered species.²⁴ Bybee and York are authorized users for four of the bank accounts subject to Antle's current money laundering allegations.²⁵ Bybee is also apparently a romantic partner of Antle.
- **Rajani Ferrante:** Ferrante is an employee of MBS, managing member of Preservation Station, and an apparent romantic partner of Antle's.²⁶ Ferrante is also listed as an authorized user on four of the bank accounts subject to Antle's current money laundering allegations.²⁷
- **Tilakam Watterson:** Watterson is Antle's daughter, a codefendant of Antle's in Virginia, and an authorized user on four of the bank accounts subject to Antle's current money laundering allegations.²⁸ Watterson is also the sole agent of the LLC that owns the MBS property—which Antle previously owned.²⁹

Antle and York share an established and common circle of associates, including Antle's children, romantic partners, and codefendants.

York and Antle's association extends far beyond that of contact information and shared associates. Antle has been intertwined with Sugriva Co LLC since its inception. The genesis of Sugriva Co LLC appears to be a direct response to Antle's arrest. York formed Sugriva Co LLC only seven days after Antle was arrested for alleged violations of federal law.³⁰ The following day, York

²⁰ Ex. 16, Horry County Land Records, 927 Folly Rd., Myrtle Beach, SC 29588 (Oct. 24, 2023).

²¹ Ex. 17, Email from China York to APHIS Animal Care, NOTICE Re: T.I.G.E.R.S. (June 11, 2022).

²² Ex. 4; Ex. 3.

²³ Ex. 4.

²⁴ Ex. 5, at ¶ 22; Ex. 6.

²⁵ Ex. 18, Affidavit in Support of an Application for a Seizure Warrant, Case No. 4:22-cr-00580-CRI, at *4-5 (June 30, 2022).

²⁶ Ex. 4.

²⁷ Ex. 18.

²⁸ Ex. 1; Ex. 18, at *4-5.

²⁹ Ex. 19, Change of Agent, Wildlife Preserve Land, LLC, South Carolina Secretary of State (May 17, 2021).

³⁰ Ex. 20, Sugriva Co LLC, Articles of Incorporation (June 10, 2022); Ex. 21, Arrest Warrant. U.S. v. Antle, No. 4:22-mj-0023 (D. S.C. June 3, 2022). York initially claimed she would be licensed under Vali Co LLC, of which Antle's son—Kody Antle—is the only other managing member. However, York ultimately used Sugriva Co LLC for licensure. York formed Vali Co LLC only five days after Antle's arrest.

informed the USDA that she would be taking over operations of MBS.³¹ Despite York's claims that Antle "will have no interest in Sugriva's USDA license," Antle claimed in a motion for bond that he "is the lifeblood of the business and the animals. Simply put, without Antle's presence and leadership, the animals, the employees' jobs, and [Myrtle Beach Safari] itself are endangered."³²

Then, during Sugriva's pre-license inspections, Antle "interrupted on several occurrences. Despite [] many requests and attempts to redirect all questions and responses to China, Antle's interference was ongoing. . . . his interjections were interfering/distracting during the entire inspection process."³³ Again, despite York's assurances to the USDA that she is "devoted full time to animal care" and that she "is the sole owner of the LLC and she will lead the company," York proceeded to defer to Antle on questions regarding animal care.³⁴ Antle told the inspector that York cannot be expected "to know all the answers to these questions since he still owns the animals/operation."³⁵ After issuing Sugriva's license, then Director of Animal Care, Dr. Robert Gibbens, informed Antle's agent that "Antle will have 30 days to complete the transfer of his business to Sugriva."³⁶ There is no evidence to suggest that such transfer has taken place. Rather, according to records released to PETA, as of January 27, 2023, "there has been "no updates regarding transfer of ownership."³⁷ Further, Antle claimed in a recent inspection that "*there is no separation of records, animal inventory, and staff* between the two license[es]."³⁸ Still, as of this writing, Antle holds himself out as the founder and director of T.I.G.E.R.S., and the facility is marketed as "*Doc Antle's Myrtle Beach Safari*."³⁹

York's licensure is an apparent attempt to circumvent Antle's disqualification from holding an AWA license. There is little to no meaningful separation between Antle and York's personal lives, businesses, or management of MBS. When York submitted Sugriva's application, former Director Gibbens stated that "unless something has changed, we don't have a case for circumvention since Antle hasn't been convicted or plead guilty to anything." Since that correspondence, Antle has been found guilty of four felonies, his alleged coconspirator has plead guilty to another, and he has been prohibited from purchasing, selling, or exhibiting animals in Virginia for the next five years. Further, Dr. Gibbens informed Antle that would have 30 days to transfer ownership of MBS to Sugriva, or to request an extension. It has been over a year since that correspondence and there is no evidence that any transfer or request has taken place. Rather, evidence suggests that Antle has retained a prominent role at MBS, despite his apparent disqualification from holding an AWA license.

³¹ Ex. 17.

³² Ex. 22, Letter from Michelle Pardo, Duane Morris, to Dr. Elizabeth Goldentyer, Deputy Administrator, APHIS Animal Care, Sugriva Co LLC Application for Class C License (July 21, 2022); Ex. 23, Defendant's Motion for Bond, U.S. v. Antle, No. 4:22-mj-0023, at *3 (D. S.C. June 14, 2022).

³³ Ex. 24, Email from Carla R. Thomas, APHIS, to Jeffery A. Shepherd, APHIS (Oct. 4, 2022).

³⁴ Ex. 22; Ex. 24.

³⁵ Ex. 24.

³⁶ Ex. 25, Email from Robert Gibbens, APHIS, to Roxanne C. Mullaney, et. al., APHIS, (Oct. 14, 2022).

³⁷ Ex. 26, Email from Carla Thomas, APHIS, to Andrew Jones and Tanesha Wilkens, APHIS, Sugriva and TIGERS inspection (Feb. 8, 2023).

³⁸ Ex. 26.

³⁹ Emphasis added. *Meet Doc Antle*, MYRTLE BEACH SAFARI, <https://myrtlebeachsafari.com/meet-doc-antle/> (last visited October 20, 2023).

IV. Conclusion

Antle's four felony convictions apparently disqualify him from holding an AWA license. 9 C.F.R. §§ 2.11(a)(7), 2.12. York's licensure through Sugriva Co LLC is an apparent attempt to circumvent Antle's disqualification. *Id.* § 2.12(a)(6). Antle's felony convictions and York's attempt to circumvent AWA regulations render them unfit to hold an AWA license and their continued licensure is contrary to the purposes of the Act. There is no meaningful distinction between Antle's exhibition at MBS through the T.I.G.E.R.S. license versus York's exhibition through Sugriva Co LLC. Both licenses share the same location, contact information, "records, inventory, and staff."⁴⁰ Further, Antle and York are both agents of the same corporations associated with MBS (Preservation Station and Sunset Penthouse LLC). Further still, the other agents of Antle and York's corporations are a small and established circle of family members, MBS employees, alleged coconspirators, and romantic partners.

There is no reason to believe that Antle is unaffiliated with Sugriva Co LLC. The USDA has given York and Antle ample time and opportunity to transfer MBS to Sugriva Co LLC in an acceptable and appropriate manner, but both Antle and York have apparently failed to do so. Accordingly, PETA respectfully requests that the USDA: (1) terminate Antle's license for violations of Virginia law pertaining to the transportation and ownership of animals; (2) terminate Sugriva Co LLC's license for apparent attempts to circumvent USDA regulations; and (3) deny future applications for AWA licenses from Antle, York, or similarly affiliated persons at MBS.

⁴⁰ Ex. 26.