July 10, 2025

Dear Chairman Larson,

We are writing to express our disappointment in the letter you released on June 26, 2025, which was published by Ogle County Life. *See*: https://oglecountylife.com/stories/ogle-county-releases-letter-addressing-claims-of-permitting-animal-cruelty,103445. Our response is intended to correct misinformation, shed light on the facts, and help both government leaders and residents of Ogle County better understand the issues at hand. Our hope is that, moving forward, the county leaders and residents can work together to end animal abuse and ensure that the laws meant to protect animals are fully upheld.

Our issues and concerns with your letter to the county are as follows:

1. In your letter, you claim a permanent special use permit was issued to the property in Rochelle (16989 E. Richie Road) in 2012, and "[t]he special use permit cannot be removed for violations of the conditions prescribed without evidence the conditions were violated and must go through the due process of hearings before the special use permit can be revoked." As you are well aware, there is an overwhelming amount of evidence of animal abuse taking place at this property, which has been provided to the Ogle County Sheriff's Office, Ogle County State's Attorney's Office, Animal Control, and the Ogle County Board members over the last four years. Sadly, our county has not taken any meaningful action to end this abuse.

Further, special use permits should not be issued on a permanent basis as this raises compliance risks in our county. There should be a periodic evaluation and renewal process in place. While we understand the intention may be to streamline permit approvals, making these permits permanent **removes a critical oversight mechanism**. Without scheduled reviews or compliance check-ins, the county exposes itself to significant risks, including but not limited to:

- a. **Animal welfare violations** (which are occurring regularly)
- b. **Safety issues** related to infrastructure (constructing building without proper permits), and the transportation of animals across state lines without proper inspection and health certification requirements (interstate commerce laws apply)
- c. Noise, traffic, and zoning impacts

Permanent special use permits may also discourage property owners' responsible event management as there is no accountability mechanism in place. We urge the board, therefore, to reconsider their policy and implement a **structured evaluation process** for special use permits to ensure compliance with public safety, animal welfare, and land use laws and regulations.

We also encourage the Ogle County Board to work with zoning to strengthen the special use permitting process for rodeo events by including language that informs permit holders that violations of the Illinois Humane Care for Animals Act (510

ILCS 70/), the Illinois Equine Infectious Anemia Act (510 ILCS 65/), and county ordinance on animal welfare may result in revocation of the permit.

2. In your letter, you claim, "Ogle County contacted the Illinois Department of Agriculture's Bureau of Animal Health and Welfare to get the department's help with the issues raised by **outside entities** making claims of animal abuse" [emphasis added]. This statement gives the false impression that only people outside of Ogle County have raised these animal abuse issues to our county leaders. That is not true. Many residents of Ogle County have called and e-mailed the Sheriff's Office, the State's Attorney for Ogle County, and the board members asking our leaders to take action to end this abuse. Some residents have come to board meetings to speak out against this abuse. Why didn't you mention anything about Ogle County residents coming forward?

In your letter, you further claim, "[t]he act of 'steer tailing' is not specifically illegal under Illinois law." However, the Illinois Humane Care for Animals Act defines an "animal" as "every living creature, domestic or wild, but does not include man." The law does not need to list every prohibited form of animal abuse by name; rather it defines cruelty in broad terms to protect every living creature, domestic or wild from unnecessary harm. Any reasonable person can interpret steer tailing as animal abuse under the current state law.

The Act prohibits "cruel treatment," "aggravated cruelty," and "animal torture," – all of which are relevant when an animal is deliberately injured for entertainment purposes. The Act states the following:

Section 3.01(a) "Cruel treatment" - "No person or owner may beat, cruelly treat, torment, starve, or overwork or otherwise abuse an animal."

Section 3.02(a), "Aggravated cruelty" - "No person may intentionally commit an act that causes a companion animal [which includes equines; see Section 2.01a.] to suffer serious injury or death."

Section 3.03(a), "Animal torture" - "A person commits animal torture when that person without legal justification knowingly or intentionally tortures an animal. 'Torture' means infliction of or subjection to extreme physical pain, motivated by an intent to increase or prolong the pain, suffering, or agony of the animal."

Section 3.(a)(4) "Owner's Duties"

- (a) "Each owner shall provide for each of his or her animals:
- (1) a sufficient quantity of good quality, wholesome food and water;
- (2) adequate shelter and protection from the weather;
- (3) veterinary care when needed to prevent suffering;
- (4) humane care and treatment.

The entire purpose of steer tailing is to torment steers, chase them on horseback repeatedly, violently grab them by their tails, wrap their tails around a horseman's sharp spurs, and violently body slam them to the ground. When steers are maimed and unable to stand on their own, they are forced to hobble on broken limbs, poked, kicked, and electrocuted by the participants. During these events, too often, steers tails are completely ripped off of their bodies ("degloved"). They suffer broken legs, horns, spines, and severe head injuries. They are subject to "runs" for hours, **receive no veterinary care to prevent suffering (which violates the Illinois Humane Care for Animals Act)**, and are transported back to Bernard, Iowa with their life-threatening injuries. During steer tailing events, horses have also suffered broken legs and are often whipped in the face by participants. All of these actions undeniably violate the Illinois Humane Care for Animals Act.

3. In your letter, you claim an outdated letter from the Illinois Attorney General (AG) Civil Rights Bureau has complicated the county's ability to address this issue. We are disappointed by the board's reliance on a letter dated November 30, 2023, that the Illinois AG Civil Rights Bureau sent to Boone County, not Ogle County. A resident of Ogle County filed a Freedom of Information of Act request two months ago and asked for records identifying that our county officials have communicated with the AG's office concerning illegal steer tailing in Rochelle. There were no records. This leads us to believe there have been no discussions. It appears there has been no effort by Ogle County leaders to provide evidence or educate the Illinois AG's office about the realities and legal concerns surrounding this steer tailing practice. Passive reliance on an old opinion while taking no proactive steps to engage with state authorities reflects a troubling lack of leadership on an issue involving illegal animal cruelty and public accountability.

Further, what is taking place in Rochelle is considered an unsanctioned rodeo event. These events neither comply with American nor Mexican-American rodeo regulations. While "charreadas" or Mexican-style rodeos are part of Mexican culture, what is happening in Rochelle **does not follow** the traditions of a Mexican-style rodeo. The Federación Mexicana de Charrería (Mexican Federation of Charrería) is the governing body that promotes, preserves, and regulates charrería, the national sport of Mexico. It was founded in 1933 with the goal of unifying charro associations (or Mexican horseman/cowboy associations), establishing competition rules, and safeguarding traditions and values of charrería. The Mexican Federation of Charrería brings together various charro associations, both within Mexico and the U.S. under a common set of rules and regulations. In order to compete in a "charreada," or Mexican-style rodeo, the associations involved must be licensed by the Mexican Federation of Charrería.

The charro associations in the U.S. emphasize the well-being of animals used in traditional Mexican rodeos. The rules focus on proper handling, transportation, and care of animals to include protection against abuse. (See attachment)

What is taking place in Rochelle is not a licensed charreada/Mexican-style rodeo. The participants do not follow the rules issued by the Mexican Federation of Charrería. Further, illegal steer tailing does not represent Mexican charreada/rodeo traditions. Illegal steer tailing is animal abuse.

Why has no one, including the State's Attorney Mike Rock, taken the time to educate the Illinois AG's office on what is really happening in Rochelle and share the evidence of years of animal abuse?

- 4. With regard to Ogle County's reliance on an outdated letter from the Illinois AG's Civil Rights Bureau, we'd like to share a letter with you that was sent from a law firm in Berkley, California to the AG's office in response to their November 30, 2023 letter to Boone County. The law firm's letter highlights the "ill-informed nature" of the Illinois AG Civil Rights Bureau's letter to Boone County officials and demands withdrawal of the letter due to "serious unfounded accusations of race-based discrimination." The law firm's letter sheds light on the facts concerning illegal steer tailing and the unfounded race issue, which should be taken seriously by the Ogle County Board, Ogle County Sheriff's Office, and Ogle County's State's Attorney. (See attached)
- 5. In your letter, you state the Illinois Department of Agriculture's "humane investigator advised they would not be getting involved and that it is very difficult to regulate rodeos under existing law because animals can get hurt in rodeos, shows and even pastures." This statement is interesting because the Illinois Department of Agriculture's website clearly states that they do not license or permit rodeos or similar events, and violations of the Illinois Humane Care for Animals Act are considered criminal offenses and are prosecuted by the county state's attorneys. It is unclear what Ogle County was hoping to accomplish by reaching out to the Department of Agriculture. Their website states the following:

"The Department of Agriculture does not license or permit rodeos or similar events. The provisions of the Humane Care for Animals Act (510 ILCS 70; "Act") apply to companion animals and livestock. It is the responsibility of event organizers, animal owners, and participants to be aware of practices and activities that may be considered violations of the Act. Violations of the Act are considered criminal offenses and are prosecuted by county state's attorneys. The Department of Agriculture cannot pursue criminal charges and does not have criminal enforcement power [emphasis added].

The Act includes requirements relating to:

- Availability of a sufficient quantity of fresh water
- Adequate shelter and protection from the weather
- No downed animals shall be sent to a rodeo nor should downed animals be allowed to participate in such event
- Veterinary care must be provided to prevent suffering.

- The Department encourages all events to maintain a relationship with a local veterinarian to ensure treatment is accessible in a timely manner.
- All animals shall be provided humane care and treatment.
 - The Department encourages event participants to carefully consider the species, size, age and condition of an animal before its participation in an event to ensure that the event will be conducted humanely.

Additionally, the Illinois Equine Infectious Anemia Act (510 ILCS 65) requires that all horses over the age of 12 months:

- entering Illinois must be accompanied by a Certificate of Veterinary Inspection, issued within 30 days prior to arrival in Illinois, and have a negative official test for Equine Infections Anemia, conducted within one year prior to entry
- that already reside in Illinois be accompanied by a negative official test for Equine Infections Anemia, conducted within one year. Horses not coming from outside the state do not have to have a CVI.

It is the responsibility of each person associated with an event, including the animals' owners/caretakers, to ensure compliance with all Illinois laws pertaining to animal health and welfare at all times.

If someone believes they have witnessed a violation of the Humane Care for Animals Act, that person should contact local law enforcement to make a report. Law enforcement, generally, can advise about how to get a copy of the report and or who a report-filer can follow up with later.

The Department of Agriculture is a regulatory agency. Department staff will make best efforts to answer questions about laws and rules the Department enforces, but the Department is not able to provide guidance or advice about best practices regarding rodeo participation."

At the June 2025 Ogle County Board meeting, a resident of Ogle County informed the board members that steers and horses are being brought into Rochelle from Bernard, Iowa to be abused at the steer tailing events. It is unclear how the county is ensuring that the property owner or supplier of the animals is following regulations as it relates to the transportation of animals across state lines, which are subject to proper inspection and health certification requirements.

6. In your letter, you state, "Perhaps those people wanting Ogle County to do something they cannot do should channel their efforts in a direction that may become more fruitful such as lobbying their state representatives to specifically outlaw 'steer tailing' or

completing a witness slip for SB 45. Unfortunately, rather than working on a solution to the issue, these out-of-county entities have engaged in the repeated email and telephone harassment of the Ogle County Board, Sheriff, State's Attorney, Zoning, and Animal Control."

What is unfortunate about this statement is that it (i) suggests that steer tailing is authorized under current law, and (ii) gives the appearance that **only** animal rights organizations outside of Ogle County have been urging the county and state leaders to take action. Steer are male bovine; an *animal* of the cattle family, and a creature that the Illinois Humane Care for Animals Act clearly and unambiguously protects from abuse. Steer tailing is abuse. Many concerned citizens of Ogle County have been speaking out against this abuse and have asked the county to uphold the **existing law**. Contrary to your assertion, we are channeling our efforts in the correct direction but, to be clear, we have also called and written to state officials regarding this issue. Unfortunately, Ogle County has continued to pass the buck and turn a blind eye to this issue.

Further, your statement that "people" should channel their efforts toward completing a "witness slip" for a proposed bill in the Illinois General Assembly (i.e. <u>SB0045</u> – "*Ban Dragging Bovine by Tail*") is misleading, as there is no committee hearing scheduled and no opportunity to submit a witness slip at this time. Citizens cannot complete a witness slip until a hearing has been scheduled by the Illinois Senate or House. As of now, no committee hearing date has been scheduled for SB0045. Regardless of the status of SB0045, Ogle County should enforce the law that is already in place to protect animals from cruel treatment, aggravated cruelty, and torture: <u>Illinois Humane Care for Animals Act</u> (510 ILCS 70/).

7. In your letter, you state, "Ogle County does not condone animal cruelty"; however, the lack of any meaningful action to investigate, regulate, or restrict clearly illegal and abusive practices (steer tailing) tells a different story. When the county grants permanent special use permits, fails to implement compliance checks, ignores evidence of animal cruelty, refuses to cite or arrest those who torment and mutilate animals, and refuses to engage with state authorities, it is condoning animal cruelty through inaction.

Choosing not to act is a decision – one that prioritizes convenience over animal welfare, legality, and community standards.

The residents of Ogle County expect more from their elected officials. We expect decisions grounded in current law, ethics, and transparency – not outdated opinions, inaction, or deflections. We urge the Ogle County Board, Sheriff's Office, and State's Attorney to take this matter seriously and correct course before further damage is done to our county's credibility, safety, and values.

We stand ready to meet with you to discuss this matter in more depth and offer further clarification, evidence, and educational resources. We believe open dialogue and collaboration

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¹ In the context of the Illinois state legislation, a witness slip is a way for individuals or organizations to publicly register their position on a bill being considered by a committee. Witness slips are used by legislators to gauge public opinion on bills before they are voted on. *See*: https://www.ilchiefs.org/filing-a-witness-slip

can lead to real progress, and we look forward to the opportunity to speak with you further on this issue, as we work together to end animal abuse in our county.

Sincerely,

Ogle County Residents
Kelleigh Miller (Oregon)
Andrew Miller (Oregon)
Melodee Hoffman (Mt. Morris)
and 13 other Ogle County residents
who wish to remain anonymous

cc:

Mike Rock, State's Attorney for Ogle County Brian VanVickle, Ogle County Sheriff Steven Huber, Chairman, Ethics and Governance Committee

Attachments

Evidence of Animal Abuse in Ogle County

- 1. Recent evidence (April 19, 2025) collected by the animal rights organization known as SHowing Animals Respect and Kindness (SHARK) and previously provided to Ogle County officials: https://www.youtube.com/watch?v=eGCy9BXTslA
- 2. People for the Ethical Treatment of Animals (PETA) Urgent Action Alert: https://www.peta.org/action/action-alerts/barbaric-steer-tailing-illinois/

Letter from Greenfire Law, PC to the Illinois Attorney General, Civil Rights Bureau

1. See attached PDF

Background on the Federación Mexicana de Charrería (Mexican Federation of Charrería)

- 1. https://en.wikipedia.org/wiki/Federaci%C3%B3n Mexicana de Charrer%C3%ADa
- 2. https://museodelacharreria.org.mx/en/about/mexican-federation-of-charreria/

Rules for Sanctioned Charrería Events in the United States and Mexico

1. Mexican Federation of Charrería Rules (the English version is attached to this letter)