

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS

vs

FILED

NOV 04 2009

No. 09 CF 236

Agency : LCSD

Sheri Thompson,
(D.O.B. 11/28/1964)
18 W Main St.
Amboy, IL 61310

Denise A McCallister
LEE COUNTY CIRCUIT CLERK

BY _____

Defendant.

PETITION FOR FORFEITURE HEARING PRIOR TO TRIAL
PURSUANT TO 510 ILCS 70/3.04(A)

NOW COMES the People of the State of Illinois, by Henry S. Dixon, Lee County State's Attorney, by his assistant, Jon Watson, and moves this honorable Court pursuant to statute to enter an order of permanent forfeiture of animal(s) seized and states the following:

1. Defendant is charged with violating 510 ILCS 70/3.01 and 510 ILCS 70/3 and 225 ILCS 605/3.
2. As a result of the allegation against the defendant, the following companion animals were seized: (see attached Exhibit "A")
3. The Humane Care for Animals Act provides that the State's Attorney may file a "petition for forfeiture prior to trial" within 14 days of seizure after the arrest of the defendant before the court having criminal jurisdiction over the alleged charges, asking for permanent forfeiture of the companion animals seized.
4. The defendant turned herself into the Lee County Jail on October 23, 2009.
5. The Humane Care for Animals Act provides that in a forfeiture hearing the burden is on the prosecution to prove by a preponderance of evidence that the person arrested violated Section 3.01, 3.02, 3.03 or 4.01.
6. That the animals seized are a unique for of "property" because they are alive, and because of that, it is in the best interests of the animals and the animal control or shelter having custody of the animals seized that this court make a speedy determination of their status prior to the criminal trial.
7. That for humane reasons, the State requests that this court hold a forfeiture hearing regarding the animals seized, pursuant to 510 ILCS 70/3.04 (a), wherein this court makes a determination as to the legal status of the animals seized.

Wherefore, the People respectfully move this Court to set a date for a forfeiture hearing regarding the animals seized.

Respectfully submitted,

Henry S. Dixon, Lee County State's Attorney

By: 

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Denise A McCallister
LEE COUNTY CIRCUIT CLERK

BY _____

Defendant.

Amended Affidavit

NAME OF PERSON CHARGED: Sheri Thompson
18 W. Main St.
Amboy, IL 61310

CHARGES: Cruel Treatment, Cts I, II 510 ILCS 70/3.01 Class 4 Felony
Violation of Owner's Duties Cts. III-VII Class B Misdemeanor
Operating a Kennel without a License Ct VIII Class C Misdemeanor

INVENTORY:

Sex	Suspected Breed	Adult/Puppy	Color
Male	Labrador	Adult	Yellow
Female	Labrador	Puppy	Black
Female	Labrador	Puppy	Black
Male	Labrador	Puppy	Black
Female	Siberian Husky	Adult	Standard
Female	Siberian Husky	Puppy	Standard
Female	Siberian Husky	Puppy	Standard
Female	Siberian Husky	Puppy	Standard
Female	Siberian Husky	Puppy	Standard
Female	Siberian Husky	Puppy	Standard
Female	Siberian Husky	Puppy	Standard
Male	Siberian Husky	Puppy	Standard
Male	Siberian Husky	Puppy	Standard

CONDITION OF ANIMALS SEIZED: Two puppies were found in a wire metal cage that was propped off the ground by cement blocks. There was not any food or water in the cage. The third puppy was found in a pull-trailer with two small holes on the door. There was not any food or water in the trailer. The Husky was in a metal fenced kennel and was pregnant. The kennel did not have a clean water supply nor appropriate bedding. The cage had feces throughout. The Husky gave birth to the Husky puppies on October 31, 2009. The animals were seized by members of Lee County Animal Control and the Lee County Sheriff's Department.

Time of Seizure: October 16, 2009 at approximately 2:00 PM

Place Taken From: 1062 Inlet Road, Amboy, IL 61310

Taken from: Sheri Thompson

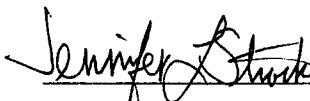
Name of Owener(s): Sheri Thompson, Anthony Thompson.



AFFIANT

Det. Jeff Dallas

Subscribed and sworn to before me this
4th day of November, 2009.

 Notary Public

