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June 13, 2018

USDA/APHIS/Animal Care
Western Region

Via e-mail: [REDACTED]

Dear AC West:

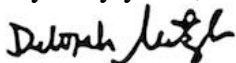
I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) promptly investigate Terrill Al-Saihati, dba "The Camel Farm" (license number 86-C-0102), for the following apparent Animal Welfare Act (AWA) violations, detailed in the attached appendix, which were documented by a concerned citizen who visited the facility on June 3:

- A camel with a growth on his chest had flies swarming around the growth, as well as his face and eyes. (*See Video and Photos 1 and 2.*)
- The eyewitness reported that several animals were seen panting, and animals were documented seeking out whatever shade they could find. (*See Photos 3–6.*)
- Enclosures were in disrepair and posed an injury risk to animals. (*See Photos 7–10.*)
- Due to the nature of the ongoing concerns it is apparent that The Camel Farm does not have a sufficient number of adequately trained employees to care for the over 150 animals at its facility.

Please ensure that animals at The Camel Farm are provided with adequate veterinary care, shelter, water, and are otherwise handled in accordance with the AWA. Please also hold Terrill Al-Saihati fully accountable for any and all violations that you discover during your investigation.

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,



Deborah Metzler, M.S.
Supervising Captive Wildlife Specialist
Captive Animal Law Enforcement
[REDACTED]

Appendix

a. Camel With Growth Apparently Still in Need of Veterinary Attention

The witness observed and documented a camel in rut, believed to be named Zo, suffering with a growth on his chest which was attracting a swarm of flies. The flies were also swarming around Zo's face and eyes. (*See* Video and Photos 1 and 2.) According to veterinarian Dr. Christine Capaldo, "it appears that the growth could be arising from the chest pad which could become irritated, infected, and painful."

The USDA has repeatedly cited The Camel Farm for failing to provide adequate veterinary care for Zo, specifically for this growth, *for over a year*.¹ On its latest publicly available inspection report from April 10, the USDA wrote that "the licensee claims this camel will be going to a veterinary specialist to be evaluated, to date this has not happened." It appears that nearly two months later, this concern *still* has not been addressed, despite the USDA having also previously cited The Camel Farm four other times for failing to adequately treat this condition.

Furthermore, the presence of flies on/near the growth is concerning. If there is any open sore or infection on this growth, the flies could lay eggs and the wound could become infested with maggots. The USDA has cited The Camel Farm twice² for the presence of flies on the chest pad growth as a violation of 9 C.F.R. § 3.131(d), requiring that "[a] safe and effective program for the control of insects, ectoparasites, and avian and mammalian pests shall be established and maintained." The April 10 inspection report stated that "[t]hese insects can potentially transmit bacteria, viruses, and parasites that can have a negative impact on the health and well-being of the animals."

Please inspect Zo, as well as his veterinary records, and ensure that he has been evaluated and treated by a veterinarian pursuant to 9 C.F.R. § 2.40.

b. Animals Seen Panting With Only Limited Access to Shade

The witness reported seeing multiple animals panting while at the facility, but was unable to record video when the device overheated. The high in Yuma on June 3 was 108 degrees. (*See* Exhibit.) A duck³ and an ostrich were photographed while panting. (*See* Photos 3 and 4.)

Though there were shade structures in the enclosures, some had more shade than others. The witness was able to document animals seeking shade wherever they could find it—in one case, goats were fenced off from where the shade structure was, and due to the angle of the sun only had a small section of shade they could huddle under. (*See* Photos 5 and 6.)

Pursuant to 9 C.F.R. § 3.127(a), "[w]hen sunlight is likely to cause overheating or discomfort of the animals, sufficient shade by natural or artificial means shall be provided to allow all animals kept outdoors to protect themselves from direct sunlight."

¹See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated April 10, 2018; February 6, 2018; November 8, 2017; August 17, 2017; and May 23, 2017.

²See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated April 10, 2018 and May 23, 2017.

³Although the USDA has not yet developed specific standards for birds, these warm-blooded animals are covered by the plain language of the AWA (*see* 7 U.S.C. § 2132(g); *see also* 9 C.F.R. § 1.1), AWA regulations, including the general AWA standards set forth in subpart F, 9 C.F.R. §§ 3.125–142.

The Camel Farm has repeatedly failed to provide adequate shade for animals.⁴ Please ensure that the animals are provided with sufficient shade and additional cooling measures during extreme temperatures, and during all times of the day.

c. Enclosures in Disrepair Posing Injury Risk to Animals

The witness observed and documented that several enclosures confining camels, goats, sheep, donkeys, zebra, and zedonks had fences which were in disrepair. The Camel Farm has pieced together different wire mesh, plywood boards, and chain-link fencing to make makeshift barriers (e.g., *see* Photo 7). In some places the fences were in such dilapidated conditions that they were posing a serious injury risk to the animals, who could get their feet caught under the fence or could be injured by sharp points (e.g., *see* Photo 8). One baby goat had his or her eye dangerously close to a sharp point (*see* Photo 9). Many of the pieces of plywood showed evidence of being chewed on, and ingesting wood splinters can cause gastrointestinal upset, blockage, or infection. (e.g., *see* Photo 10).

The Camel Farm has repeatedly failed to ensure its facilities are "maintained in good repair to protect the animals from injury" in accordance with 9 C.F.R. § 3.125(a). In its most recent publicly available inspection report from April 10, the USDA noted several areas of fencing that posed an injury risk to the animals, including gaps in fencing where animals could get stuck, sharp points from broken metal fencing, jagged and splintered edges from broken wooden boards, rusted metal walls with sharp edges, and at least one animal ingesting wood from the fence.⁵ The report required that "all enclosures must be kept in good repair and free of sharp points, protruding edges, holes, and gaps/openings in order to protect the animals from injury." It appears this concern, which was also cited for on 15 other inspections in just over five years,⁶ remains uncorrected.

d. Apparent Failure to Have Sufficient Number of Employees to Care for Animals

The witness noted only two workers at the facility during the June 3 visit. A woman was chatting with visitors and collecting admission fees, while a young man was tending to some of the animals. The USDA's April 10 inventory listed 142 animals, which doesn't include the several ducks, geese, ostriches, emus, rhea, and tortoises at the facility. USDA has cited the facility for persistent and ongoing animal health and welfare concerns, which could be the result of the lack of employees to adequately care for the animals. Only having two individuals to care for over 150 animals is in apparent violation of 9 C.F.R. § 3.132, which requires that "[a] sufficient number of adequately trained employees shall be utilized to maintain the professionally acceptable level of husbandry practices set forth in this subpart."

In fact, the USDA has repeatedly cited The Camel Farm for failing to have an adequate number of employees. On its March 8, 2016⁷ inspection report, the licensee reportedly said "that the facility will never be in compliance, as they do not have the funds or resources to increase their staffing levels." Over two years later, with *dozens* of repeat violations on its record including many direct and critical veterinary care issues, it's clear that The Camel Farm has not corrected this violation. Several animals have suffered due to inadequate training and untimely observance of animal health concerns.

⁴See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated February 6, 2018; August 17, 2017; May 23, 2017; March 7, 2017; August 2, 2016; and May 20, 2014.

⁵See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated April 10, 2018.

⁶See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated February 6, 2018; November 8, 2017; August 17, 2017; May 23, 2017; March 7, 2017; November 16, 2016; August 2, 2016; April 27, 2016; November 10, 2015; May 20, 2014; January 14, 2014; June 15, 2013; February 27, 2013; and December 21, 2012.

⁷See USDA Inspection Report, Terrill Al-Saihati, dba The Camel Farm, license number 86-C-0102, dated March 8, 2016.