

July 20, 2020

The Honorable Tom Wolf
Governor of Pennsylvania

Re: Dillan the Asiatic Black Bear

Dear Governor Wolf,

Six months ago today, Dillan the bear was rescued from long-term cruelty and neglect at the Union County Sportsmen's Club (the Club) in Millmont. I'm writing to update you on Dillan's condition, and to renew the call originally made by Alec Baldwin on January 14 to use your authority to ensure that Dillan's abusers are charged.

Dillan underwent dental surgery on February 8. His veterinarians found that he suffered from painful and life-threatening dental issues that were left unattended for years. (Exhibit 1) During Dillan's two-and-a-half-hour surgery, dentists extracted twelve teeth and performed a root canal. The abscess in one tooth was so severe that it was draining puss through a hole it bored through his gums. Dillan had been in extreme pain for years. On the day of his surgery, Dillan weighed 857 lbs., more than *two and a half times* the average weight of a male Asiatic black bear.

Under PA law, a person commits the offense of neglect of an animal when they (in pertinent part) "fail[] to provide for the basic needs of each animal to which the person has a duty of care, where belonging to himself or otherwise, including ... (1) [n]ecessary sustenance and potable water, (2) [a]ccess to clean and sanitary shelter, ... (3) necessary veterinary care."¹ A person commits the offense of cruelty to animals when they (in pertinent part) "intentionally, knowingly or recklessly illtreat[] ... or abuse[] an animal."²

The Club was first cited by the U.S. Department of Agriculture (USDA) for failing to treat Dillan's dental issues and obese body condition, as well as Dillan's entrenched stereotypic behavior of rocking back and forth, failing to provide Dillan with adequate space or an appropriate enclosure, and failing to provide him with an appropriate diet on July 13, 2017. (Exhibit 2) The Club therefore knew of those issues and failed to address them for *at least* that long. The USDA's inspection reports also make clear that the Club has a pattern of failing to seek veterinary care when needed and of disregarding veterinary advice, including dispensing medication to Dillan against veterinary advice.

Pat Craig, the Executive Director of The Wild Animal Sanctuary (TWAS), has opined that in his 40 years of rescuing abused and neglected captive wildlife, Dillan's dental disease was the most severe and advanced he has ever seen, and

¹ 18 Pa. Stat. and Cons. Stat. Ann. § 5532

² 18 Pa. Stat. and Cons. Stat. Ann. § 5533

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS
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2154 W. Sunset Blvd.
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Norfolk, VA 23510
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PETA FOUNDATION IS AN
OPERATING NAME OF FOUNDATION
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AFFILIATES:

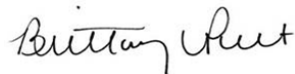
- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

that Dillan is, by far, the most obese bear of the more than 300 that his organization has rescued. Dillan has now lived at TWAS for six months. Starting on his first day and ever since, the rocking behavior that Dillan engaged in virtually every moment of his waking life at the Club has ceased. Dillan is now an engaged, curious bear who enjoys smelling the natural ground, resting on soft substrate, and eating fresh fruits and vegetables. He enjoys submerging in his pool, and roaming the acreage in his habitat with his new bear friend named Lily.

For ten years, Dillan was denied everything that a bear needs. Dillan suffered in agony, so obese that his massive stomach dragged on the ground, with infection raging in his mouth, all the while trapped in a cramped cell on harsh concrete.

For years, the Club knew that Dillan was suffering and did nothing. PETA repeatedly reached out to the Club, including behind-the-scenes, in the summer of 2019, providing them with an expert veterinary opinion (Exhibit 3) and offering to arrange for Dillan's transfer to TWAS at no cost to them. The Club refused and Dillan continued to suffer. It was only after months of intense campaigning, and intervention from state and federal officials that Dillan, in his advanced age, was finally provided the opportunity to live without pain in an enriched environment with professional care. Dillan suffered horribly and daily for *years* due to the Club's knowing neglect and cruelty, and they must not be allowed to get away with it. Dillan's case has garnered national headlines and the world is watching how Pennsylvania handles his case. Please prove that Pennsylvania truly prioritizes animal welfare by ensuring that Dillan's abusers are charged, convicted, and punished to the fullest extent of the law.

Very Truly Yours,



Brittany Peet, Esq.

Deputy General Counsel for Captive Animal Law Enforcement

The PETA Foundation

Cc: Corporal Michael J. Spada

Exhibits



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 14-JAN-2020

2.40(b)(2) DIRECT REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

** The facility's geriatric Asiatic black bear, "Dillon", continues to have severe dental issues including missing several teeth, a recessed gum line, and a broken left lower canine tooth that has black discoloration in the center of the remnant of the tooth. The severity and chronic nature of these dental issues are likely to have caused the bear a significant amount of pain over a long period of time and the condition of the teeth has continued to deteriorate since first documented in 2017. A veterinarian that the facility is consulting with did prescribe Clindamycin and Meloxicam for the bear that the facility picked up on December 17, 2019. However, after consulting with other exotic veterinarians, the consulting veterinarian advised the facility by December 18, 2019, to not give the medications until further diagnostics could be performed, such as blood work and an accurate body weight. The facility opted to give the medications to the bear despite the guidance of the consulting veterinarian to wait and gave both medications in their entirety without further communication with the consulting veterinarian.

Additionally, the bear is morbidly obese, with limited mobility and continues to exhibit a repetitive behavior in which he sits on his haunches and repeatedly rocks himself back and forth by using his forepaws to push against the wall in front of him, and will rock back against a large stone behind him in his enclosure. Repetitive abnormal behavior of this nature can often be an indicator of pain and/or psychological distress. This repetitive behavior was first documented in 2017 and has been viewed on subsequent inspections and no methods of assessing, addressing or minimizing the underlying causes for this behavior have been put into action. For the weight loss, the consulting veterinarian has advised the facility of a nutritionist who is willing to help them formulate a diet but the facility had not yet provided the required information, such as how much food was currently fed and complete descriptions of types of feed.

The facility's geriatric bobcat is similarly obese and the caretaker stated that the animal no longer utilizes climbing structures within the enclosure. The facility has added ramps to the platforms in the enclosure but the bobcat is not utilizing these either. The AV did prescribe an over-the-counter medication containing a milk protein as the active ingredient that the facility started on December 18, 2019. However, there has been no improvement in mobility and

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

14-JAN-2020

Title:

ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

14-JAN-2020



Inspection Report

this also has not been communicated to the AV. Similar to the bear, the consulting veterinarian did provide contact information for a nutritionist but the facility has not yet provided the necessary information (amount currently fed, type of feed).

The consultant AV has also provided contact information for a nutritionist for the obese raccoons, but the facility has not yet provided the necessary information (amount currently fed, type of feed) to accurately adjust the diet amounts for a weight reduction plan.

Evaluation of the animals is necessary so that appropriate methods can be put in place to:

- Manage potential pain indicated through lack of mobility in the bear and bobcat
- Manage weight for bear, bobcat, and raccoons through guidance in proper nutrition and diet amounts
- Manage dental disease and pain for bear through appropriate means of diagnosis and treatment.
- Assess abnormal repetitive behavior by the bear and address underlying causes such as physical pain and psychological distress

Furthermore, administration of medications against the recommendations of the prescribing veterinarian can have significant adverse impacts on an animal's health if the estimated weight was incorrect or if bloodwork revealed underlying health concerns, such as inadequate liver or kidney function. All of these issues can impact how the medications are metabolized and can lead to a toxicity to the animal.

These areas of care need to be addressed as all these issues are having a negative impact on the health and welfare of these animals. Correct by: having these animals examined by a consulting veterinarian as directed by your attending veterinarian and following the plan for diagnosis and treatment provided by that veterinarian.

This inspection and exit interview were conducted with a facility representative.

Additional Inspectors

Carlson Melissa, Veterinary Medical Officer

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

14-JAN-2020

Received By:

Title:

Date:

14-JAN-2020



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	14-JAN-20

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000005	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000009	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**
Certificate: **23-C-0176**
Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION
Date: 26-NOV-2019

2.40(b)(2) DIRECT REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

** The facility's geriatric Asiatic black bear, "Dillon", continues to have severe dental issues including missing several teeth, a recessed gum line, and a broken left lower canine tooth that has black discoloration in the center of the remnant of the tooth. There continues to be a visible area on the lower left jaw of moist yellow discoloration consistent with the appearance of a draining tooth abscess. The severity and chronic nature of these dental issues are likely to have caused the bear a significant amount of pain over a long period of time and the condition of the teeth has continued to deteriorate since first documented in 2017.

Additionally, the bear is morbidly obese, with limited mobility and exhibits a repetitive behavior in which he sits on his haunches and repeatedly rocks himself back and forth by using his forepaws to push against the wall in front of him, and will rock back against a large stone behind him in his enclosure. Repetitive abnormal behavior of this nature can often be an indicator of pain and/or psychological distress. This repetitive behavior was first documented in 2017 and has been viewed on subsequent inspections and no methods of assessing, addressing or minimizing the underlying causes for this behavior have been put into action.

Also noted with the bear during today's inspection is that he has a white, opaque discharge from the right nostril and a cough was heard while feeding the bear. During a discussion with the caretaker, she stated that he had not previously noted a nasal discharge from the bear previously and it had not been discussed with a veterinarian. The facility's geriatric bobcat is similarly obese and the caretaker stated that the animal no longer utilizes climbing structures within the enclosure. The AV hasn't evaluated the bobcat for body condition, changes in behavior and decline in mobility or activity.

The facility has recently made some modifications to the enclosures (including the addition of ramps to the bobcat and wooden platforms for the bear) and reached out to several consultant veterinarians who have experience in exotic species. One of the consultant veterinarians did visit the facility to observe the condition of the bear's mouth but information had not been provided to the veterinarian to address the bear's mobility, his repetitive behaviors,

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:
26-NOV-2019

Title: ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:
26-NOV-2019



Inspection Report

and obesity. The mobility issues with the bobcat and the obesity issues of the bobcat and raccoons were also not discussed with this veterinarian.

Evaluation of the animals is necessary so that appropriate methods can be put in place to:

- Manage potential pain indicated through lack of mobility in the bear and bobcat
- Manage weight for bear, bobcat, and raccoons through guidance in proper nutrition and diet amounts
- Manage dental disease and pain for bear through appropriate means of diagnosis and treatment.
- Assess abnormal repetitive behavior by the bear and address underlying causes such as physical pain and psychological distress
- Manage nasal discharge and cough from the bear in order reduce the likelihood of more serious respiratory issues from arising

These areas of care need to be addressed as all these issues are having a negative impact on the health and welfare of these animals. Correct by: having these animals examined by a consulting veterinarian as directed by your attending veterinarian and following the plan for diagnosis and treatment provided by that veterinarian.

This inspection and exit interview were conducted with a facility representative.

Additional Inspectors

Carlson Melissa, Veterinary Medical Officer

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:
26-NOV-2019

Received By:

Title:

Date:
26-NOV-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	26-NOV-19

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000005	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000009	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 16-OCT-2019

2.40(b)(2) DIRECT REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

** The facility's geriatric Asiatic black bear, "Dillon", was observed to have severe dental issues that were seen as the animal was eating. The bear is missing several teeth and has a broken left lower canine tooth that has black discoloration in the center of the remnant of the tooth. There is a moist yellow discoloration on the lower left jaw consistent with the appearance of a draining tooth abscess. The right lower canine tooth appears to be sheared so that the pulp cavity is exposed and is visible below the natural gum line. The gum line is recessed, and the tooth remnant has a black discoloration. There are no visible upper canine teeth. The severity and chronic nature of these dental issues are likely to have caused the bear a significant amount of pain over a long period of time and the condition of the teeth has continued to deteriorate since first documented in 2017.

Discussions with the facility representative revealed that they are aware of the dental issues with the bear but the Attending Veterinarian (AV) has not been comfortable sedating the bear for further examination and potential treatment.

Additionally, the bear is morbidly obese, with limited mobility and exhibits a repetitive behavior in which he sits on his haunches and repeatedly rocks himself back and forth by using his forepaws to push against the wall in front of him, and will rock back against a large stone behind him in his enclosure. The caretaker confirmed this is a behavior that is observed frequently. Repetitive abnormal behavior of this nature, can often be an indicator of pain and or psychological distress. This repetitive behavior was first documented in 2017 and has been viewed on subsequent inspections and no methods of assessing, addressing or minimizing the underlying causes for this behavior have been put into action.

The facility's geriatric bobcat is similarly obese and the caretaker stated that the animal no longer utilizes climbing structures within the enclosure. The AV hasn't evaluated the bobcat for weight gain, changes in behavior and decline in mobility or activity.

Prepared By: **D AMBROSIO ANDREA, A C I**

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:
17-OCT-2019

Title: ANIMAL CARE INSPECTOR 6003

Received By: [Redacted]

Date:



Inspection Report

Both the bear and the bobcat are declawed and housed in enclosures that consist of only concrete as the ground surface with the exception of dens that have straw bedding and two rubber mats placed in the bobcat's enclosure. The combination of old age, obesity, and being declawed, likely contribute to impacts on mobility due to arthritis or joint pain. There have been no plans to pursue any diagnostics or treatment to diagnose or alleviate any discomfort the animals might be experiencing.

Facilities are required to establish and maintain programs of adequate veterinary care that include the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries. Failures to address the old age related problems, obesity, and lack of mobility of these animals, and the dental disease of the bear are having a negative impact on the health and welfare of these animals.

3.125(a)

FACILITIES, GENERAL.

There is a section of chain link in the bobcat enclosure that has been cut above the pvc water trough. There are pieces of chain link protruding into the left side of the enclosure. These sharp ends have the potential to cause injury. These areas of cut chain link need to be addressed to keep the enclosure in good repair and for the safety of the animal.

Correct by: Oct 21, 2019

This inspection and exit interview were conducted with a facility representative.

Additional Inspectors

Gage Laurie, Big Cat Specialist

Carlson Melissa, Veterinary Medical Officer

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

17-OCT-2019

Received By:

Date:



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	16-OCT-19

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000006	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000010	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 25-JUL-2019

2.40(b)(2)

REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

*** During the inspection, the Asiatic Black bear had observed hair loss along his sides and hindquarters and he was rubbing along the metal support beam in the enclosure for several minutes. The caretaker mentioned that he appeared to have hair loss seasonally but the facility has not contacted the vet notifying him of the condition nor has the facility used appropriate methods to prevent or treat the hair loss and skin condition. The facility needs to contact the attending veterinarian for guidance on appropriate methods for preventative care since this is a noted reoccurring condition.

This inspection and exit interview were conducted with the animal caretaker.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

25-JUL-2019

Title:

ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

25-JUL-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	25-JUL-19

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000006	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000010	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 07-MAY-2019

3.129(b)

FEEDING.

*** The deer feeder on the right side of the bear enclosure needs to be addressed. The wood base is damp and the grain is also damp with evidence of caking and mold in the feed. Adequate measures need to be taken to keep the grain dry for the health of the animals.

Correct by: May 13, 2019

This inspection and exit interview were conducted with a facility representative.

Additional Inspectors

Hadjis Tonya, Supervisory Animal Care Specialist

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

09-MAY-2019

Received By:

Title:

Date:

09-MAY-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	07-MAY-19

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000006	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000010	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 08-FEB-2019

2.40(b)(2) CRITICAL

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

*** The facility lost five fawns this past year shortly after birth. According to the facility and attending veterinarian, pathology results indicated that the fawns did not have adequate amounts of vitamin E in their diet, were emaciated with high load of parasites. As the fawns would have been nursing, the vitamin E deficiency is with the female deer who are receiving a grain produced for multiple hoof stock species not specialized for deer. The attending veterinarian informed the facility they needed to add Vitamin E to the diet but the facility has not done so. The facility needs to follow guidance for feeding required by the attending veterinarian to prevent future loss due to diet deficiency.

Correct by: Feb 15, 2019

3.129(a) REPEAT

FEEDING.

*** In the winter the refrigerator does not work to maintain adequate temperatures for perishable food items (ie, too cold to defrost or freezing items). At the time of the inspection, raw chicken for the bobcat was again being thawed in the food barn in a plastic bucket on the floor. There was a space heater next to the chicken to assist with the thawing process. The current method of thawing food in the winter does not protect the meat from thawing in an uneven manner. Thawing in this type of uncontrolled manner increases the chances of food spoilage and contamination.

*** The facility has been transitioning the bear to a dry dog diet. Due to old age and dental issues, the bear is still being offered left over restaurant food (donuts, muffins, pasta, bread and fries) to feed. These types of food are poor nutritive value while containing excessive calories that contributes to the bear's excessive weight. Obesity poses a significant risk to the health of the animal and it is imperative that a diet that is nutritious and an appropriate quantity is fed daily as directed by the attending veterinarian.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

12-FEB-2019

Title:

ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

12-FEB-2019



Inspection Report

*** The diet prep area does not have running water in the winter. As a result, food prep items (knives, cutting boards, bowls and food buckets) were left out with residual old food debris still on them. The manner of preparing and storing these food items leaves the potential for the food to become contaminated and hence not palatable, wholesome or maintaining nutritive value for the overall health of the animals.

Licensee must ensure the food is wholesome, palatable and free from contamination.

3.131(a) REPEAT

SANITATION.

*** There is an accumulation of feces in the raccoon and the bear enclosure that needs to be removed. The piles of feces in the bear enclosure cover both sides of the enclosure and do not enable the bear to move around freely without having contact with the waste. Enclosures should be cleaned as often as necessary to prevent contamination of the animal and reduce odors and disease hazards.

3.132 REPEAT

EMPLOYEES.

*** The facility currently employs one part time animal caretaker. There is no back up animal care employee who is able to feed or care for the animals if this employee is unavailable to work. The work required to maintain adequate husbandry and care of the animals is beyond the capacity of one part time employee as noted by the food preparation and sanitation issues. The facility needs to ensure that a sufficient number of adequately trained employees are in place to maintain a professional level of husbandry and care.

This inspection and exit interview were conducted with the board member in person and via phone. In addition, an exit briefing was conducted with the animal caretaker via phone.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

12-FEB-2019

Title:

ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

12-FEB-2019



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
9127	23-C-0176	001	UNION COUNTY SPORTSMENS CLUB INC	08-FEB-19

Count	Scientific Name	Common Name
000001	<i>Lynx rufus</i>	BOBCAT
000006	<i>Odocoileus virginianus</i>	WHITE-TAILED DEER
000002	<i>Procyon lotor</i>	RACCOON
000001	<i>Ursus thibetanus</i>	ASIATIC BLACK BEAR
000010	Total	



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**
Certificate: **23-C-0176**
Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION
Date: 15-FEB-2018

3.129(a)

FEEDING.

*** The feeder for the deer contained grass clippings that had appeared to been put in the feeder several months ago. The grass clippings were old had a musty odor. When clumps were broken these were discolored grey to white and released particles consistent with improper drying. Additionally there was an excessive accumulations of bird feces on the surface of these grass clippings. Grass clippings fed in this manner are not appropriate feed material and pose a risk to the health of the animals. In addition to the grain, the facility is feeding baked goods as treats, these items with excessive sugar are also not appropriate to feed to the deer as they can potentially cause irritations in the gut.

*** The facility has been in the process of transitioning to a primary diet of dog food for the bears. Due to illness of the primary animal caretaker and lack of dog food, the facility brought out buckets of restaurant left over food (donuts, muffins, pasta, breads, fries, and cooked meat products) to feed. These types of food are poor nutritive value while containing excessive calories that contributes to the bear's excessive weight. Obesity poses a significant risk to the health of animals, therefore due to the current body condition of these animals, it is imperative that a diet that is nutritious and of appropriate quantity is fed.

*** At the time of the inspection, raw chicken for the bobcat was being thawed in the food barn in a plastic pan on the floor. There was a heater on the chicken to assist with the thawing process. The facility states that due to lack of insulation the frozen chicken will not thaw in the refrigerator. The current method of thawing food in the winter does not protect the meat from thawing in an uneven manner. Thawing in this type of uncontrolled manner increases the chances of food spoilage and food borne illness. The manner of thawing food in the winter needs to be addressed to maintain the nutritive value of the food and to assure the health of the animals.

*** The facility needs to create a diet plan for all species that meets the specific nutritive needs of the species. This plan should detail specific daily diet amounts to maintain a healthy body condition of the animals. The plan should be assessed by the attending veterinarian.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

15-FEB-2018

Title:

ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

15-FEB-2018



Inspection Report

Correct by: Feb 23, 2018

3.132

EMPLOYEES.

*** The current facility caretaker is considered part time and works 7 days a week. There is no back up animal care employee who is able to feed or care for the animals if an emergency came up. Recently the animal caretaker was ill and dry diet could not be ordered for the bears. In addition, the bear pen has not been cleaned in over a week because there was no one who was trained to clean. The facility needs to assure that a sufficient number of adequately trained employees are in place to maintain a professional level of husbandry and care.

Correct by: April 15, 2018

This inspection and exit interview were conducted with the animal caretaker and board president.

Additional Inspectors

Miller Dana, Supervisory Animal Care Specialist

Prepared By: D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:
15-FEB-2018

Received By:

Title:

Date:
15-FEB-2018



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**
Certificate: **23-C-0176**
Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION
Date: 24-OCT-2017

2.40(b)(2) REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

*** The Asiatic black bear's left bottom canine tooth has broken down further to the jaw line. There still appears to be a visual hole with black in the middle of the tooth. The vet came out to look at the bear with instructions to keep and eye on the animal. Since the tooth has broken down further, the vet has not been contacted for further assessment. Broken canines can be very painful and lead to infections that are potentially life threatening. This bear should be re-evaluated by the attending veterinarian to assess the condition of the tooth and jaw and determine a course of treatment.

*** The bears are geriatric and obese with their front claws removed. The diet of these animals is not of nutritive value to maintain them in a healthy body condition. In addition to dog food, the bears are given left over food from the club restaurant (pasta, breads, fries, and cooked meat products) which contributes to their excessive weight. Additionally, according to the caretaker the bears are not fed more food during fall which is a period of hyperplasia for them and therefore do not go down into a period of winter lethargy. Dietary issues in bears can contribute to multiple health care problems and this diet should be evaluated by the attending vet to assure their dietary needs are being met and maintained in a manner that prevents injury and health issues.

*** The Asiatic black bear was sitting down by the front side of the enclosure and was moving in a repetitive rocking motion for extended periods of time throughout the inspection. This is an abnormal behavior pattern and can be due to the limited functionality of his enclosure, or potentially from pain from a broken tooth. This bear should be evaluated by the attending vet with appropriate methods to diagnose and treat injuries for this animal.

3.125(a) REPEAT

FACILITIES, GENERAL.

*** The chicken wire above at the top of the raccoon enclosure is broken and the raccoons are climbing through the mesh and walking and defecating on the top section of the wire. The mesh needs to be removed or maintained in good repair for the safety of the animals.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:
24-OCT-2017

Title: ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:
24-OCT-2017



Inspection Report

3.125(d) REPEAT

FACILITIES, GENERAL.

*** Currently when the bear enclosures are cleaned, the bear feces are moved out and still piled next to the enclosure dens which are located in the deer pens. Some type of appropriate trash container with a lid should be provided so the enclosures can be cleaned appropriately and feces not placed in other animal area. This needs to be addressed for the health of the deer at the facility.

3.131(a)

SANITATION.

*** There is a strong odor in the raccoon enclosure due to the accumulation of feces on top of the chicken wire above their nest box and platform. This section of wire needs to be removed and the feces cleaned to prevent contamination to the animals and reduce disease hazards and odors.

Correct by: Nov 3, 2017

This inspection and exit interview were conducted with the facility animal caretaker.

Additional Inspectors

Neafsey Michael, Veterinary Medical Officer

Prepared By: **D AMBROSIO ANDREA, A C I**

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:
24-OCT-2017

Received By:

Title:

Date:
24-OCT-2017



Inspection Report

Union County Sportsmens Club Inc
766 Thomas Dam Rd
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: 13-JUL-2017

2.40(a)(1)

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

*** There is not enough guidance on the consultant agreement forms with the attending veterinarian. The current agreement just lists that the vet is willing to consult and care for the animals and come out quarterly. There is no mention of current methods of parasite control, vaccines or method of euthanasia. The agreement should provide adequate guidance to assure the vet has adequate authority over animal health care issues.

Correct by: July 20, 2017

2.40(b)(2)

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

*** Currently one geriatric bobcat is both blind and deaf according to the facility caretaker. While being observed the bobcat would jump/flinch when gunshots would go off at the facility. The caretaker stated this behavior did not start occurring until the animal lost vision and hearing. This flinching behavior can indicate stress for the animal. Since this is a facility with an adjacent gun range, and shots are fired frequently throughout the day every day, the facility should consult with the attending vet and determine an appropriate method to alleviate the stressful impact on this animal.

*** The Asiatic black bear has a broken left front canine that is black in the middle of the tooth. Broken canines can be painful and lead to possible infections. This bear should be evaluated by the attending vet to assess the condition of the tooth and determine a possible course of treatment.

*** The bears are geriatric and obese with their front claws removed. These bears are under treatment for arthritis, but are currently housed in a concrete slab enclosure with no soft resting surfaces. Additionally the diet of these animals is not of nutritive value to maintain them in a healthy body condition. In addition to dog food, the bears are given left over food from the club restaurant (pasta, breads, fries, and cooked meat products) which contributes to

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Date:

13-JUL-2017

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ANIMAL CARE INSPECTOR 6003

Received By:

Title:

Date:

13-JUL-2017



Inspection Report

their weight. Additionally according to the caretaker the bears are not fed more food during fall which is a period of hyperplasia for them and therefore do not go down into a period of winter lethargy. Dietary issues in bears can contribute to multiple health care problems and this diet should be evaluated by the attending vet to assure their dietary needs are being met and maintained in a manner that prevents injury and health issues.

Correct by: July 20, 2017

3.125(a)

FACILITIES, GENERAL.

*** The chicken wire above at the top of the raccoon enclosure is broken and the raccoons are climbing through the mesh and walking and defecating on the top section of the wire. The mesh needs to be removed or maintained in good repair for the safety of the animals.

*** One of the wooden bobcat shelter boxes has a broken board at the base of the box. This is leaving a nail exposed which can pose a potential injury to the animals. This board should be replaced and the box maintained in good repair for the safety of the animals.

Correct by: July 20, 2017

3.125(c)

FACILITIES, GENERAL.

*** The fridge storing meat products for the animals needs to be cleaned. Currently some meat is directly on the wire racks and fluids are pooled on the floor of the fridge. The manner of storing food does not prevent contamination and meat should be placed in leak proof bins or trays. This fridge needs to be addressed for the health of the animals.

Corrected by: July 15, 2017

3.125(d)

FACILITIES, GENERAL.

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

13-JUL-2017

Received By:

Title:

Date:

13-JUL-2017



Inspection Report

*** Currently when the bear enclosures are cleaned, the bear feces are moved out and piled next to the enclosure dens which are located in the deer pens. Some type of appropriate trash container with a lid should be provided so the enclosures can be cleaned appropriately and feces not placed in other animal area. This needs to be addressed for the health of the deer at the facility.

Correct by: July 20, 2017

3.128

SPACE REQUIREMENTS.

*** Currently both bears which are declawed and obese are housed in a concrete slab enclosure with no soft resting surfaces. As these are declawed bears, there is a lot more pressure put on their front paws and these animals should be given resting surfaces off the ground, or bedding in the den areas. In addition, the Asiatic black bear was sitting down by the front side of the enclosure and was moving in a repetitive rocking motion for extended periods of time. This is an abnormal behavior pattern and can be due to the limited functionality of his enclosure. Normal postural adjustment for these animals would be to create day beds with soft bedding which is not currently provided and have climbing surfaces. This enclosure needs to be addressed to promote normal postural and social adjustments for the health of the animals.

Correct by: July 31, 2017

3.129(b)

FEEDING.

*** The deer feeder to the right of the bear enclosure is in disrepair with the wood roof rotted out. The feeder no longer adequately protects the food supply from deterioration. The current daily grain was on top of older grain that had essentially turned to fine dust. Additionally based on the feeder position, it is difficult to clean around and underneath the feeder. This feeder needs to be replaced, to adequately protect the food supplies from contamination and deterioration.

Correct by: Aug 10, 2017

3.131(a)

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

13-JUL-2017

Received By:

Title:

Date:

13-JUL-2017



Inspection Report

SANITATION.

The bobcat enclosure cannot be effectively cleaned because there is no way to safely enter the enclosure and scrub out dens and furniture items. The current den boxes are dirty and have an accumulation of old bedding and food items. There is no shift area to lock the animals out of the enclosure so cleaning can occur in a safe and effective manner. This enclosure needs to be addressed to facilitate adequate cleaning of the enclosure.

Correct by: Aug 13, 2017

3.132

EMPLOYEES.

*** The inspector tried to inspect the facility on July 12 at 2:00 in the afternoon. Although there was multiple employees of the facility available, no one knew how to care for the animals or could accompany the inspector at that time. The current facility caretaker is considered part time and works 7 days a week. There is no back up animal care employee who is able to feed or care for the animals if an emergency came up and the part time caretaker could not come to the facility. This needs to be addressed as a sufficient number of adequately trained employees must be utilized to maintain a professional level of husbandry and care.

Correct by: Sept 13, 2017

This inspection and an exit interview were conducted with the facility animal caretaker

Prepared By:

D AMBROSIO ANDREA, A C I

D AMBROSIO ANDREA, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6003

Date:

13-JUL-2017

Received By:

Title:

Date:

13-JUL-2017



Inspection Report

Union County Sportsmens Club Inc
50 Sportsmens Club Lane
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: Oct-20-2015

3.127 (b)

FACILITIES, OUTDOOR.

3.127 - Facilities, outdoor. (b)

The north side of the deer enclosure was closed off from the south side by a gate. One Buck and two doe were present in the north side which has few trees and no artificial shelter. Correct by providing these animals access to shelter from inclement weather.

The coyote had a large dog house for shelter and was properly bedded with shavings but the dog house did not have a windbreak. A windbreak may be needed in the winter to assure the animal can remain protected from the weather and prevent discomfort. Correct by providing a windbreak.

Natural or artificial shelter appropriate to the local climatic conditions for the species concerned shall be provided for all animals kept outdoors to afford them protection and to prevent discomfort to such animals.

To be corrected by: 30 October 2015

3.127 (c)

FACILITIES, OUTDOOR.

The coyote enclosure has running water that is backing up in front of the shelter entrance. An attempt has been made to limit the water by running a hose to the lower part of the trough but this is ineffective. This backup causes the animal to have to walk thru water to enter its shelter and could lead to discomfort and disease especially as the weather gets colder. The water also effectively reduces the size of the enclosure if the animal tries to avoid it. Correct by preventing the water from covering unintended portions of the shelter floor.

A suitable method shall be provided to rapidly eliminate excess water. The method of drainage shall comply with applicable Federal, State, and local laws and regulations relating to pollution control or the protection of the environment.

To be corrected by 30 October 2015

Prepared By:

DAVID OELBERG, D V M

DAVID A OELBERG, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1043

Date:

Oct-20-2015

Received By:

Title:

Date:

Oct-20-2015



Inspection Report

3.131 (a)

SANITATION.

A wire top had been constructed over the Raccoon Portion of the enclosure that housed raccoon and skunk. This wire top was accessible to the raccoon thru the open door into the uninhabited skunk area. The raccoon has defecated significantly on the top of this wire and there was an accumulation of feces at the time of inspection. Correct by cleaning the feces regularly and/or restricting access to this part of the enclosure.

A nesting box for birds was present inside the northern deer enclosure adjacent to the Bear enclosure. The roof of the nesting box was sloped toward the bear enclosure and was covered with feces. This configuration can lead to contamination of the bear enclosure with bird feces during rains and may cause disease in the bear. Correct by changing the location or configuration of the nesting box and routine cleaning. This item was corrected before the exit briefing.

Excreta shall be removed from primary enclosures as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.
To be corrected by: 26 October 2015

An exit briefing was conducted with the animal caretaker.

Prepared By:

DAVID OELBERG, D V M

DAVID A OELBERG, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1043

Date:

Oct-20-2015

Received By:

Title:

Date:

Oct-20-2015



Inspection Report

Union County Sportsmens Club Inc
50 Sportsmens Club Lane
Millmont, PA 17845

Customer ID: **9127**

Certificate: **23-C-0176**

Site: 001

UNION COUNTY SPORTSMENS CLUB INC

Type: ROUTINE INSPECTION

Date: Aug-12-2014

3.125 (a)

FACILITIES, GENERAL.

The deer enclosure had areas where significant space had been created under the fence on the far side of the enclosure. The bobcat, Coyote, and Raccoon enclosure perimeter gates were not secured sufficiently to prevent entry of the public. These items need to be corrected to assure the safety of the animals. Correct By: 5 October 2014

An exit interview was conducted with facility caretaker.

Prepared By:

DAVID OELBERG, D V M

DAVID A OELBERG, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER Inspector 1043

Date:

Aug-12-2014

Received By:

Title:

Date:

Aug-12-2014



June 27, 2019

Orville Spangler, President
Union County Sportsman's Club

Dear Mr. Spangler,

I am a veterinarian with 12 years of experience, including nearly ten years of particular experience providing veterinary care to, and researching the welfare of, Asiatic black bears in captivity. I am writing to you today to share my grave concerns over the health, behavior, and welfare of the animals held captive at Union County Sportsman's Club, to urge you to close down the menagerie, and to offer assistance in connecting you with reputable organizations that can help place the animals in excellent permanent homes.

After reviewing and evaluating footage taken at Union County Sportsman's Club by concerned citizens, I was disturbed to see that a bear, birds, bobcats, and other small mammals are confined to barren, cramped, concrete enclosures devoid of the natural features minimally required to meet their unique and complex species-specific needs. While I have numerous specific and serious concerns over the conditions for these animals, because the conditions are wholly inadequate for each of the species, I will provide a brief overview in this letter. Birds at the facility are confined to over-crowded, highly unsanitary enclosures, many of which were composed of metal wire flooring and devoid of environmental enrichment leading to aggression, trauma, and indications of foot disease and lameness in several animals. Bobcats and raccoons were confined to similarly cramped enclosures with inadequate substrates and space, providing no opportunity to engage in species-specific foraging or other natural behaviors important for their wellbeing.

Dillon, the Asiatic black bear is forced to live on concrete, with inadequate space, and lacking adequate bedding materials or natural substrates. Confinement to such conditions frustrates a bear's highly motivated and genetically ingrained need to engage in natural behaviors such as roaming, digging, nesting, and foraging, resulting in chronic deprivation that has severe consequences for Dillon's wellbeing. Bears are highly intelligent animals and require environments in captivity that provide opportunities to engage in exploratory and problem-solving behaviors to satisfy their cognitive and behavioral needs. Long-term physical, behavioral, and mental deprivation often results in the development of abnormal behaviors, which can include prolonged inactivity, but most commonly manifests as repetitive behaviors indicative of psychological stress including pacing, head-tossing, and bar-biting which can result in painful arthritis and fractures to the teeth. Indeed, USDA inspection reports indicate that Dillon has suffered from tooth fractures that have been left untreated, resulting in extreme pain and predisposing him to life-threatening infections.

Despite numerous citations from the USDA indicating that the Union County Sportsman's Club has repeatedly failed to provide animals with adequate veterinary care, nutrition, and sanitation, the observations detailed above demonstrate long-term evidence of neglect indicating an ongoing failure to correct these deficiencies.

I urge you to prioritize the wellbeing of these animals by agreeing to close down the Union County Sportsman's Club menagerie and allowing the animals to be rehomed to reputable facilities. I can be reached by email at [REDACTED]

[REDACTED] I look forward to your reply.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Bando'.

Monica Bando, B.S., M.S., B.V.Sc., M.R.C.V.S.
PhD Candidate, Veterinary Clinical Sciences
College of Veterinary Medicine
Washington State University
[REDACTED]