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UNITED STATES DEPARTMENT OF AGRICULTURE

BEFORE THE SECRETARY OF AGRICULTURE

In re:	)	AWA Docket No. 20- J-0147
	)	
TERRILL AL-SAIHATI, an individual, doing business as THE CAMEL FARM,	)	
	)	
	)	COMPLAINT
Respondent.	)	

There is reason to believe that the Respondent named herein has willfully violated the Animal Welfare Act, as amended (7 U.S.C. § 2131 *et seq.*)(AWA or Act), and the regulations thereunder (9 C.F.R. § 1.1 *et seq.*)(Regulations). Therefore, the Administrator of the Animal and Plant Health Inspection Service (APHIS) issues this complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. The Respondent Terrill Al-Saihati is an individual doing business as The Camel Farm, whose address is in the State of Arizona. The Respondent's address will not be provided in the complaint to protect the Respondent's personal privacy but will be provided to the Hearing Clerk, United States Department of Agriculture, for the purpose of service of this complaint and future documents. At all times mentioned herein, the Respondent was an exhibitor, as that term is defined in the Act and the Regulations, and held AWA license number 86-C-0102.

ALLEGED VIOLATIONS

2. On or about August 21, 2015, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent,

control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, a female brown gobex needed her hooves trimmed. 9 C.F.R. § 2.40(b)(2).

3. On or about November 10, 2015, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. A female camel had abnormal hind legs causing her to have difficulty rising, when standing. 9 C.F.R. § 2.40(b)(2).

b.c. A female black sheep kept squinting her right eye. 9 C.F.R. § 2.40(b)(2).

4. On or about January 13, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. An adult male coati had an abnormal thickened milky-white right eye. 9 C.F.R. § 2.40(b)(2).

b. A camel calf had an abnormal swollen left hind hock. 9 C.F.R. § 2.40(b)(2).

5. On or about March 8, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent,

control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, a black goat had an abnormal swollen left knee. 9 C.F.R. § 2.40(b)(2).

6. On or about April 27, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, a male coati had a moist and reddened lesion on his tail. 9 C.F.R. § 2.40(b)(2).

7. On or about August 2, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, two (2) pigs needed their hooves trimmed. 9 C.F.R. § 2.40(b)(2).

8. On or about October 26, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. The Respondent failed to establish and maintain an adequate Program of Veterinary Care (PVC), as it did not contain adequate provisions of emergency care. 9 C.F.R. § 2.40(a)(1).

b. A camel (identified as "Gimpy") was identified as not receiving treatment and died on or about September 14, 2016. 9 C.F.R. § 2.40(b)(2).

c. A female coati had an abnormal swollen, extremely reddened, discharged filled, left eye. 9 C.F.R. § 2.40(b)(2).

9. On or about November 15, 2016, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. The Respondent failed to establish and maintain an adequate Program of Veterinary Care (PVC), as it did not contain adequate provisions of emergency care. 9 C.F.R. § 2.40(a)(1).

b. An adult female coati (identified as "Shyla") had an abnormal swollen left eye. 9 C.F.R. § 2.40(b)(2).

c. Three (3) pigs needed their hooves trimmed. 9 C.F.R. § 2.40(b)(2).

d. Two (2) goats needed their hooves trimmed. 9 C.F.R. § 2.40(b)(2).

10. On or about March 7, 2017, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. The Respondent failed to establish and maintain an adequate Program of Veterinary Care (PVC), as it did not contain adequate provisions of emergency care. 9 C.F.R. § 2.40(a)(1).

b. Two (2) pigs needed their hooves trimmed. 9 C.F.R. § 2.40(b)(2).

c. A juvenile female goat had abnormal skin covering the tips of her ears; also, her overall hair coat was dull, crusty, and dry with areas of hair loss. 9 C.F.R. § 2.40(b)(2) and (3).

d. A female deer had a fresh wound over her left shoulder. 9 C.F.R. § 2.40(b)(2) and (3).

e. An adult female coati (identified as "Shyla") had an abnormal swollen, red, and scabby protruding left eye. 9 C.F.R. § 2.40(b)(2) and (3).

f. A young female goat was unable to straighten her front legs at the knees. 9 C.F.R. § 2.40(b)(2) and (3).

g. An adult male tricolor goat was non-weight bearing on his right front leg. 9 C.F.R. § 2.40(b)(2) and (3).

11. On or about May 23, 2017, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. The Respondent failed to establish and maintain an adequate Program of Veterinary Care (PVC). 9 C.F.R. § 2.40(a)(1).

b. A male dromedary (identified as "Zo") had an abnormal growth, which was covered in flies, on his chest pad. 9 C.F.R. § 2.40(b)(2).

c. An adult female fennec fox (identified as "Foxy") had hair loss over the knuckles of all four paws; also, she needed her paw nails trimmed. 9 C.F.R. § 2.40(b)(2).

d. A female ibex (identified as "Pixie") had a patchy, dull haircoat; also, she was underweight. 9 C.F.R. § 2.40(b)(2).

e. A female coati (identified as "Tuffy") had an abnormal mass on her abdominal region. 9 C.F.R. § 2.40(b)(2).

f. Three (3) pigs needed their hooves trimmed. 9 C.F.R. § 2.40(b)(2).

g. An adult male tricolor goat was non-weight bearing on his right front leg. 9 C.F.R. § 2.40(b)(2).

12. On or about August 17, 2017, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. A male dromedary (identified as "Zo") had an abnormal growth, which was covered in flies, on his chest pad. 9 C.F.R. § 2.40(b)(2).

b. An adult female fennec fox (identified as "Foxy") had hair loss over the knuckles of all four paws; also, she needed her nails trimmed. 9 C.F.R. § 2.40(b)(2).

c. A female ibex (identified as "Pixie") was identified as not receiving treatment and was culled on May 27, 2017. 9 C.F.R. § 2.40(a)(2).

13. On or about February 6, 2018, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. An adult female brown sheep was underweight. 9 C.F.R. § 2.40(b)(2).

b. An adult male tricolor goat was non-weight bearing on his right front leg. 9 C.F.R. § 2.40(b)(2).

14. On or about April 10, 2018, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit:

a. An adult male coati (identified as "Cody") was non-weight bearing on his right rear leg. 9 C.F.R. § 2.40(b)(2).

b. An adult female fennec fox (identified as "Foxy") had hair loss with red and inflamed skin over the knuckles of all four paws; also, she needed her paw nails trimmed. 9 C.F.R. § 2.40(b)(2).

c. An adult male tricolor goat (identified as "Thor") was non-weight bearing on his right front leg. 9 C.F.R. § 2.40(b)(2).

d. An adult female brown sheep (identified as "Goldberry") was underweight; also, she had some lameness in her right front forelimb. 9 C.F.R. § 2.40(b)(2).

e. A baby black and white sheep had trouble walking and standing. 9 C.F.R. § 2.40(b)(2).

f. An adult male ibex hybrid had an abnormal red mass above its right eye, which was red, inflamed, and bulging out of his eye socket. 9 C.F.R. § 2.40(b)(2) and (3).

15. On or about May 7, 2019, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, a female white goat had swelling near her mouth and was shaking and leaning her head. 9 C.F.R. § 2.40(b)(2).

16. On or about January 28, 2020, the Respondent willfully violated the regulations (9 C.F.R. §2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observations of the animals, to wit, a female black and white sheep displayed abnormal eye movement and had loss of vision; also, she displayed head twitching and an abnormal gait. 9 C.F.R. § 2.40(b)(2).

WHEREFORE, it is hereby ordered that for the purpose of determining whether the Respondent has in fact willfully violated the Act and the Regulations, this complaint shall be served upon the Respondent. The Respondent shall file an answer with the Office of the Hearing Clerk, Room 1031-South Building, United States Department of Agriculture, 1400 Independence Avenue, SW, Washington, DC 20250-9200, in accordance with the Rules of Practice governing proceedings under the Act (7 C.F.R. §§ 1.130-162.13). Failure to file an answer shall constitute an admission of all the material allegations of this complaint. APHIS requests that this matter

proceed in accordance with the Rules of Practice governing proceedings under the Act, and that such order or orders be issued as are authorized by the Act (7 U.S.C. § 2149) and warranted under the circumstances.

Done at Washington DC
this ____ day of _____ 2020

ANTHONY SHEA Digitally signed by ANTHONY SHEA Date: 2020.07.16 12:19:27 -04'00'

Kevin Shea
Administrator
Animal and Plant Health Inspection Service

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