

November 12, 2020

Robert Gibbens, DVM
 Director, Animal Welfare Operations
 USDA/APHIS/Animal Care

Via e-mail: [REDACTED] animalcare@usda.gov

Re: Request for Investigation of Apparent Animal Welfare Act Violations at
 SeaQuest (License No. 88-C-0216)

Dear Dr. Gibbens,

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate SeaQuest Holdings, LLC (“SeaQuest,” license no. 88-C-0216, Site 001) for apparent violations of the Animal Welfare Act (AWA), including improper handling of a sloth who died and three incidents of otters biting employees.

According to recently obtained public records from Clark County Animal Control, a one-year-old sloth named Flash died at SeaQuest’s Las Vegas location on July 30, 2020. Ex. 1. Flash had reportedly been at SeaQuest for only seven months. Ex. 2. The necropsy and limited medical records publicly available for review documented that Flash had a history of weakness, twitching, and inappetance, and was very thin at the time of his death. Ex. 1. While the necropsy does not identify a definitive cause of death, it does raise serious concerns about SeaQuest’s ability to care adequately for this species. Wildlife veterinarian Dr. Monica Bando opined:

Sloths in captivity are prone to numerous issues that are secondary to poor husbandry and diet, including dysbiosis (imbalance in gut microbes). Twitching and weakness suggests nutritional and/or metabolic imbalances, and dysbiosis can contribute to poor absorption of nutrients. In an animal this young, the top concerns would be nutritional or metabolic derangements and infection. Poor husbandry, premature maternal separation, inappropriate diet, unnatural environment, and handling and associated chronic stress likely all contributed to a very compromised immune system for this individual who would have struggled to cope with any sort of infection.

The death of a sloth this young, after a month of inexplicable medical symptoms, is concerning. The USDA has previously cited another facility for the premature death of a young sloth, stating that “lack of knowledge of the species” was a contributing factor in the animal’s death.¹ Please fully investigate the circumstances that led to Flash’s death as it appears that SeaQuest may have violated 9 C.F.R § 2.131(a), which requires that “[a]ll licensees who maintain wild or exotic animals must demonstrate adequate experience and knowledge of the species they maintain.”

¹ See USDA Inspection Report December 10, 2019 for Debbie Dolittle’s Indoor Petting Zoo (aka Jozee Rooz Indoor Petting Zoo/City Goats Farm & Zoo Inc.) license no. 91-C-0141.

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Despite the reported veterinarian evaluation in the month prior to Flash’s death, this animal may have been suffering long before that. As you investigate this matter, please review all of Flash’s veterinary and daily husbandry records. Please also ensure that all diets at this facility are “of sufficient quantity and nutritive value to maintain all animals in good health . . . with consideration for the age, species, condition, size, and type of the animal” in accordance with 9 CFR § 3.129(a).

In addition to Flash’s death, the records from Clark County Animal Control also document several incidents of the otters (Chip and Dale)—who are typically used in encounters with the public—biting employees.

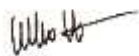
- On May 20, 2019, a SeaQuest employee was bitten by Dale when bathing him. Ex. 3.
- On September 7, 2019, a SeaQuest employee was bitten by Chip while handling him for an unspecified reason. Ex. 4.
- On January 3, 2020, a SeaQuest employee was bitten by Chip while handling him for an encounter with a guest. Ex. 5.

Please ensure that SeaQuest is handling the otters in accordance with 9 C.F.R. § 2.131(b)(1), which states that “[h]andling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.” Please also ensure that SeaQuest is protecting the safety of all animals and guests involved in encounters pursuant to 9 C.F.R. § 2.131(c)(1), which requires that “[d]uring public exhibition, any animal must be handled so there is minimal risk of harm to the animal and to the public.”

Please ensure that all regulated animals at SeaQuest’s Site 001 are being provided with adequate veterinary care, space, shelter, food, and water and are otherwise handled in accordance with the AWA. Please also hold SeaQuest fully accountable for any and all violations that you discover during your inspection.

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,



Willow Hecht, M.Sc.
Wildlife Specialist, Captive Animal Law Enforcement

