

April 15, 2021

Anita Candelaria
Wildlife Licensing Specialist
Utah Division of Wildlife Resources

Via email: [REDACTED]

Re: Request to Investigate Yellowstone Bear World
(COR No. 1COMM6536-2)

Dear Mrs. Candelaria,

I am writing on behalf of PETA to request that the Utah Division of Wildlife Resources (UDWR) investigate Courtney Ferguson, dba Yellowstone Bear World for apparent violations of the regulations governing animals possessed under a Certificate of Registration (COR) for Commercial Possession.

Pursuant to a COR for Commercial Possession (COR No. 1 COMM6536-2), Ferguson transported to and exhibited six 12-week old black bear cubs at a “Baby Animal Days” event in Wellsville, Utah from April 7-10, 2021. Any animal held under a COR “shall be maintained under humane and healthy conditions, including the humane handling, care, confinement, transportation, and feeding, as provided in 9 CFR Section 3 Subpart F,” which are implementing regulations promulgated pursuant to the federal Animal Welfare Act (AWA). Utah Admin. Code r. R657-3-6(1). Any violation of R657-3-6 is punishable as an infraction. Utah Admin. Code r. R657-3-33(1) (a violation “shall be punishable as provided in Section 23-13-11”); Utah Code § 23-13-11(2) (classifying a violation as an infraction).

As detailed in the attached Exhibit A, the conditions in which these black bears were exhibited appear to violate the AWA, which in turn would also violate R657-3-6(1). The UDWR should not only investigate and issue an appropriate infraction for exhibiting these bears in inhumane conditions, but the agency should also refuse to issue any CORs to Ferguson for this type of exhibit in the future. In deciding whether to issue a COR, the UDWR “may consider any available facts or information that is relevant to the issuance or renewal of the certificate of registration.” Utah Admin. Code r. R657-3-14(6). The UDWR is required to consider “the health, welfare, [and] safety” of the animals and “the suitability of the applicant’s holding facilities,” and thus any information bearing on these considerations is relevant. Utah Admin. Code r. R657-3-14(1). Notably, the UDWR “may deny issuing or renewing a certificate of registration to any applicant, if . . . holding the animal at the proposed location violates federal, state, or local laws.” Utah Admin. Code r. R657-3-14 (4)(d).

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

The bear cubs exhibited by Ferguson were confined to a barren enclosure that lacked a water bowl, bedding, soft substrate, and any shelter, visual barriers, or quiet retreat from the large crowds, exposing them to relentless and excessive environmental stressors. Exhibiting 12-week old bear cubs in these conditions appear to violate the AWA, and is detrimental to their health and welfare. The UDWR should not allow Ferguson to exhibit bear cubs in these conditions in the future.

Please fully investigate these concerns, and hold Ferguson accountable for any and all state law violations. In order to prevent this inhumane handling of bear cubs in the future, please refuse to issue Ferguson a COR for these types of events.

Thank you for your attention to this important matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michelle Sinnott".

Michelle Sinnott, Esq.
Associate Director, Captive Animal Law Enforcement

