

PEOPLE FOR  
 THE ETHICAL  
 TREATMENT  
 OF ANIMALS  
 FOUNDATION

Washington  
 1536 16th St. N.W.  
 Washington, DC 20036  
 202-483-PETA

Los Angeles  
 2154 W. Sunset Blvd.  
 Los Angeles, CA 90026  
 323-644-PETA

Norfolk  
 501 Front St.  
 Norfolk, VA 23510  
 757-622-PETA

PETA FOUNDATION IS AN  
 OPERATING NAME OF FOUNDATION  
 TO SUPPORT ANIMAL PROTECTION.

AFFILIATES:

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

April 15, 2020

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

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

Re: Request for Investigation of Apparent Animal Welfare Act Violations by  
 Yellowstone Bear World Inc. (License No. 82-C-0042)

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture investigate Yellowstone Bear World Inc. (“YBW,” license number 82-C-0042) for apparent Animal Welfare Act (AWA) violations, which were documented by concerned citizens who visited the traveling exhibit at the “Baby Animal Days” event in Wellsville, Utah on April 10, 2021.

YBW brought six 12-week old bear cubs to the event and confined them in a small, barren enclosure inside a barn, where crowds of guests were allowed to view them for a four-day period from April 7-10. The concerned citizens documented on April 10 that one of the bear cubs had thinning or missing hair, indicative of itch mites, other ectoparasites, internal parasites, ringworm, inadequate nutrition, allergies, and/or psychological distress. (See [Video 1](#).) Many of these conditions cause discomfort and/or pruritis (itchiness) which can lead to painful secondary infections and require immediate or ongoing veterinary care to prevent unnecessary pain and suffering. This bear cub should be examined by a qualified veterinarian pursuant to 9 C.F.R. § 2.40.

Further, the enclosure confining the bear cubs 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 noise. (See [Video 2](#).) This environment presents numerous stressors, prevents the cubs from expressing natural behaviors such as denning and digging, and the noise level is likely compromising their ability to obtain good quality sleep, which will further compromise their physical and psychological health. The cub’s poor coat condition indicates that YBW is not providing the cubs with sufficient space, in apparent violation of 9 C.F.R. § 3.128, which states in part that “[i]nadequate space may be indicated by evidence of malnutrition, *poor condition*, debility, stress, or abnormal behavior patterns” [emphasis added]. The USDA has previously cited several other exhibitors for failing to provide bears with adequate space and enrichment in conditions similar to these, including Bob Steele, dba The Great Bear Show, and Wilson’s Wild Animal Park.<sup>1</sup>

<sup>1</sup> See USDA Inspection Report, Bob Steele III, license number 74-C-0837, February 25, 2017 and USDA Inspection Report, Wilson’s Wild Animal Park, license number 52-C-0038, September 18, 2017.

Exhibiting the bear cubs in a stressful and inadequate environment appears to be in further violation of 9 C.F.R. § 2.131(b)(1) and (d)(1), which require that animals be exhibited only “under conditions consistent with their good health and well-being” and that “[h]andling of all animals shall be done ... in a manner that does not cause... unnecessary discomfort.” In addition, it appears that this kind of cub display is in violation of 9 C.F.R. § 2.131(c)(3) which states “[y]oung or immature animals shall not be . . . exhibited for periods of time which would be detrimental to their health or well-being.”

Please ensure that all animals exhibited by YBW are being provided with adequate veterinary care, space, shelter, food, and water and are otherwise handled in accordance with the AWA. Please also hold YBW fully accountable for 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,



**Monica K. H. Bando, MS, BVSc, PhD, MRCVS**  
Wildlife Veterinarian, Captive Animal Law Enforcement

cc: Andrea D'Ambrosio, Animal Care Inspector, USDA/APHIS/AC