

October 15, 2015

Elizabeth Goldentyer, D.V.M.
Eastern Regional Director
USDA/APHIS/AC

Robert Gibbens, D.V.M.
Regional Director
USDA/APHIS/AC Western Region

Via e-mail: aceast@aphis.usda.gov; acwest@aphis.usda.gov

Re: Request for Investigation of Living Treasures Animal Park and Wildlife & Environmental Conservation, Inc., for Transporting 4-Day-Old Leopard Cubs

Dear Drs. Goldentyer and Gibbens,

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Living Treasures Animal Park (LTAP; license number 23-C-0261) for allowing the transfer of two 4-day-old leopard cubs to Wildlife & Environmental Conservation, Inc. (WEC; license number 93-C-0832), in apparent violation of the Animal Welfare Act (AWA).

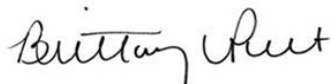
The attached transport record indicates that LTAP took two leopard cubs who were born at its New Castle, Pennsylvania, facility on June 26, 2015, and shipped them to WEC in Moorpark, California, on July 1, 2015.

As is described in detail in the attached appendix, unnecessarily removing infant cubs from their mothers and subjecting them to the stresses of transport appears to violate the AWA's handling regulations.

Please ensure that all animals at LTAP and WEC are provided with adequate veterinary care, shelter, food, and water and are otherwise handled in accordance with the AWA, and hold the facility fully accountable for any and all violations that you discover during your investigation.

Please inform me of the complaint number that the USDA assigns to this correspondence. Thank you for your attention to this important matter.

Very truly yours,



Brittany Peet
Deputy Director, Captive Animal Law Enforcement

cc: Laurie Gage, D.V.M., D.A.C.V.M., Big Cat and Marine Mammal Specialist,
USDA/APHIS/AC

Attachment

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS
FOUNDATION

Washington, D.C.
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

Oakland
554 Grand Ave.
Oakland, CA 94610
510-763-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.)

Appendix

Pursuant to 9 C.F.R. § 2.131(b)(1) and (c)(3), respectively, "[h]andling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma ... behavioral stress, physical harm, or unnecessary discomfort" and "[y]oung or immature animals shall not be exposed to rough or excessive public handling or exhibited for periods of time which would be detrimental to their health or well-being."

Removing cubs from their mothers prematurely and subjecting them to the stresses and excessive handling required to ship them apparently violates 9 C.F.R. § 2.131(b)(1) and (c)(3) and can cause young cubs without fully developed immune systems to become injured, sick, or highly stressed—and can even result in their deaths.¹ In 2013, two 3-day-old tiger cubs died within two days of their transfer to Big Cats of Serenity Springs (BCSS). In its inspection report citing BCSS for the deaths, the USDA stated that "[t]ransportation and handling of very young and unhealthy animals may cause trauma, behavioral stress, and unnecessary discomfort and may have contributed to these animals' deaths."² The USDA also acknowledged the risks inherent to handling infant cubs earlier this year when Bryan Hovatter was cited for subjecting young cubs to encounters with the public:

Cubs of this age [5 weeks old] that have not been adequately vaccinated do not have fully intact immune systems and are therefore susceptible to many infectious diseases. The practices described above do not constitute handling these cubs as carefully as possible and unnecessarily risks harm and discomfort. The licensee must ensure that if the tigers are to be removed from the mother, handling must be done as carefully as possible and that exposure to members of the public does not occur until the cubs are immunocompetent and vaccinated.³

The USDA also recently cited Joe Schreibvogel (license no. 73-C-0139) for prematurely removing cubs from their mother and subjecting them to excessive handling, finding the following:

Animals this young [19 days old] in the absence of their parents are not able to adequately thermoregulate and exposure to temperatures which may be comfortable for adults may still be detrimental to the health of young cubs. Exposure to an excessive number of people and other animals at this young age poses a disease risk to the cub. Even indirect exposure via the licensee who has contact with the members of the public and other animals can pose a similar risk to the cub of this age. The practices described above do not constitute handling the cub as carefully as possible and unnecessarily risks harm and discomfort.... The licensee must ensure that if [cubs] are to be removed from the mother that handling must be done as carefully as possible in a temperature regulated environment and that exposure to members of the public and other animals does not occur until the cubs are immunocompetent and vaccinated.⁴

¹The USDA has determined that infant large cats who are less than approximately 8 weeks old should not be subjected to excessive handling because their immune systems have not "developed sufficiently to protect them from most communicable diseases." USDA, [Big Cat Question and Answer](#).

²See USDA Inspection Report, Nick Sculac, License No. 84-C-0069, May 23, 2013.

³See USDA Inspection Report, Bryan Hovatter dba "Hovatter's Wildlife Zoo," License No. 54-C-0110, June 4, 2015.

⁴See USDA Inspection Report, Joe Schreibvogel, License No. 73-C-0139, Aug. 5, 2015.

LTAP has a history of prematurely removing cubs from their mothers, causing an unnecessary risk of harm, discomfort, malnutrition, and even death. *See* correspondence from PETA to the USDA dated March 26, 2006, reporting the death of a leopard cub from apparent weak bone density (attached).

LTAP's chronic disregard for the well-being of young big cats was illustrated earlier this year when a [juvenile lion was attacked by his father](#). During a USDA inspection following the attack, LTAP was cited for failing to provide the juvenile lion with adequate veterinary care and an adequate nutritional plan, stating that "the length in time to get diagnostic information about the lion's condition and the lack of attention to investigate the nutritional value of the lion's diet illustrate that appropriate methods were not taken to prevent, diagnose, and treat diseases."⁵

LTAP has a history of irresponsibly transferring animals to facilities that allow them to suffer and die from inadequate care. In 2009, LTAP transferred a 4-week-old tiger to Plumpton Park Zoo,⁶ and the tiger died nine months later after ingesting plastic materials. The tiger also suffered from metabolic bone disease and anemia caused by a poor diet and was heavily infested with fleas. In 2012, LTAP transferred two 4-month-old leopards to Tim Stark. A few weeks later, Stark found one of the leopards dead from what he suspected was metabolic bone disease, but he never sought treatment from a veterinarian.⁷ He barbarically killed the second leopard a few days later with a baseball bat.

Please ensure that Animal Care inspectors are aware of the health risks posed by handling and shipping infant cubs and that USDA policies are upheld at all USDA-licensed facilities.

⁵See USDA Inspection Report, Living Treasures Animal Park II, License No. 23-C-0107, July 13, 2015.

⁶See USDA Inspection Report, Plumpton Park Zoological Gardens, License No. 51-C-0021, July 27, 2010.

⁷See USDA Inspection Report, Tim Stark, License No. 32-C-0204, June 25, 2013.