

May 11, 2016

Elizabeth Goldentyer, D.V.M.  
Director, Animal Welfare Operations  
USDA/APHIS/AC Eastern Region

Via e-mail: [aceast@aphis.usda.gov](mailto:aceast@aphis.usda.gov)

Re: Request for Investigation of Apparent Animal Welfare Act Violations at  
Hovatter's Wildlife Zoo (License No. 54-C-0119)

Dear Dr. Goldentyer:

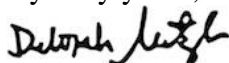
I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) promptly investigate Bryan Hovatter, dba "Hovatter's Wildlife Zoo" (license no. 54-C-0119) for the following apparent Animal Welfare Act (AWA) violations, detailed in the attached appendix, that were observed and documented on April 23:

- An alpaca had overgrown teeth which apparently impaired his or her ability to eat. See [Video 1](#) and Photo.
- Chimpanzees exhibited stereotypical behaviors indicating psychological distress and inadequate environmental enrichment. See [Video 2](#) and [Video 3](#).

Please ensure that all animals at Hovatter's Wildlife Zoo are provided with adequate veterinary care, shelter, food, and water and are otherwise handled in accordance with the AWA. Please also hold Bryan Hovatter fully accountable for any and all violations that you discover during your investigation.

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,



Deborah Metzler, M.S.  
Wildlife Specialist, Captive Animal Law Enforcement

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AFFILIATES:

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

## Appendix

### a. Alpaca in Need of Corrective Trimming for Overgrown Teeth

On April 23, a witness observed and documented an alpaca whose teeth were so overgrown he or she was not able to eat a carrot that the witness offered the alpaca. *See* [Video 1](#) and Photo below. The teeth of this alpaca were plainly long enough to impede his or her ability to eat, and the situation will only get worse until it is addressed. This is a basic husbandry requirement, particularly in facilities where the animals are not grazing on substrates that they're naturally adapted to.

Please examine the alpacas and llamas, as well as their veterinary records, and ensure that they are receiving adequate veterinary care for this condition, pursuant to 9 C.F.R. § 2.40.

### b. Chimpanzees Exhibiting Signs of Psychological Distress

The witness also observed and documented chimpanzees for over 30 minutes who exhibited signs of psychological stress. One chimpanzee was repeatedly licking and sucking on his hand, which he continued to do throughout the witness' visit (*see* [Video 2](#)). Another chimpanzee was consistently Bronx cheering (making "raspberry" sounds with his lips) throughout the over 30 minutes he was observed by the witness. *See* [Video 3](#). Though this behavior is a common attention-getter in captive chimpanzees and is also observed when chimpanzees are grooming, the constant pattern of this behavior suggests that it is stereotypical. This chimpanzee also had hair loss on his arms, which could be due to over-grooming—another indication of psychological distress. He also had thinning hair across his legs and back which could indicate an abnormal skin condition.

Please examine the chimpanzees, as well as their veterinary records, to ensure that they are receiving adequate veterinary care in accordance with the mandates of 9 C.F.R. § 2.40.

Abnormally repetitive behaviors such as sucking, incessant Bronx cheering, and hair-plucking are stereotypies and are signs of poor welfare and psychological distress. According to Georgia Mason, a renowned and widely published animal-behavior researcher and professor at the University of Guelph:

[S]tereotypies should warn us that the animal has probably been in an unchanging and frustrating environment, and that its welfare has probably been unsatisfactory. Much evidence does indeed link the development of stereotypies with specific sub-optimal environments. The development of a stereotypy in an individual is therefore the sign of an animal that has probably been suffering, and whose well-being may be poor still.<sup>1</sup>

Hovatter's is exhibiting these chimpanzees in apparent violation of 9 C.F.R. § 2.131(d)(1), requiring that "[a]nimals shall be exhibited only for periods of time and under conditions consistent with their good health and well-being" and *Id.* § 2.131(b)(1) requiring that the "[h]andling of all animals shall be done ... in a manner that does not cause trauma ... behavioral stress ... or unnecessary discomfort."

Hovatter's does not appear to be following a plan of environmental enhancement that is adequately addressing the chimpanzees' psychological needs pursuant to 9 C.F.R. § 3.81, which states that exhibitors "must develop, document, and follow an appropriate plan for environment enhancement adequate to promote the psychological well-being of nonhuman primates." The chimpanzee enclosures were notably small and devoid of any object enrichment aside from the apparently semi-permanent hanging tires and

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<sup>1</sup>G.J. Mason, *Stereotypies and Suffering*, Behavioural Processes 25, 103–15, 1991.

barrels. Chimpanzees are highly intelligent and active primates, and require various and numerous items of environmental enrichment to keep their minds stimulated.

Pursuant to 9 C.F.R. § 3.81(c)(2), the chimpanzees "must be provided special attention regarding enhancement of their environment" because they "show signs of being in psychological distress through behavior or appearance." Furthermore, "exhibitors... must include in the environment enhancement plan special provisions for great apes..., including additional opportunities to express species-typical behavior." *Id.* § 3.81(c)(5).

## Photo Appendix



Alpaca with severely overgrown teeth, apparently impeding his or her ability to eat.