

March 12, 2018

Jodi Niccum
 Law Enforcement Program Supervisor
 Arizona Game and Fish Dept.

Via email: [REDACTED]

Re: Apparent Violations of State Captivity Standards at The Camel Farm Zoo

Dear Ms. Niccum:

I am writing on behalf of PETA to provide additional information on the current conditions at The Camel Farm—owned and operated by Terrill Al-Saihati. On February 25, 2018, a concerned citizen observed and documented several apparent violations of the captivity standards in Ariz. Admin. Code R12-4-428. A few weeks earlier, the United States Department of Agriculture (USDA) cited The Camel Farm for numerous repeat violations of the federal Animal Welfare Act (AWA), which are also violations of the state captivity standards. The documented concerns at the facility include the following:

- Multiple animals with overgrown hooves, which is a recurring problem at this facility (*See Photos 1-7; see also Feb. 8, 2018 USDA Inspection Report, Ex. A.*)
- A camel with a large chest growth that had numerous flies crawling on it (*See Photo 8; see also Ex. A.*)
- Multiple animals lacked adequate shelter (*See Photos 1, 5-6, 9-12; see also Ex. A.*)
- Two enclosures were muddy, and contained standing water and excessive feces (*See Photos 1-3 and 12-13; see also Ex. A.*)
- Numerous enclosures were in various states of disrepair (*See Ex. A.*)
- A female camel and her nursing calf did not have access to any water for an unknown period of time, such that when she was finally provided water she drank and searched for water for 8 minutes (*See Ex. A.*)
- A gopher carcass was observed laying on the ground in the goat enclosure (*See Ex. A.*)
- Multiple animals were in need of, but were not being provided, adequate veterinary care (*See Ex. A.*)
- The Camel Farm was unable to provide the USDA inspectors with any records on the animals in their care (*See Ex. A.*)

In light of this new information, in addition to the information that I provided on January 9, 2018, I am reiterating my request that the Arizona Game and Fish Department (AZGFD) not renew The Camel Farm's Zoo License, which expired on December 31, 2017. *See Ariz. Admin. Code R12-4-420(F); R12-4-409(4).* At a

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

Berkeley
 2855 Telegraph Ave.
 Ste. 301
 Berkeley, CA 94705
 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.)

minimum, The Camel Farm should be inspected immediately, and cited for these continuing violations. Ariz. Admin. Code R12-4-409(N).

Please let me know if you need any additional information. Also, please keep me informed as to AZGFD's decision on The Camel Farm's license renewal.

Very truly yours,



Michelle Sinnott
Counsel, Captive Animal Law Enforcement

██████████ | ██████████

Appendix

AZGFD is required to “deny a zoo license to a person who fails to meet the requirements established under R12-4-409.” Ariz. Admin. Code R12-4-420(F). One of those requirements is that a license holder “shall keep live wildlife in a facility according to the captivity standards prescribed under R12-4-428.” Ariz. Admin. Code R12-4-409(I). In addition, AZGFD must “deny a zoo license when [i]t is in the best interest of the wildlife.” Ariz. Admin. Code R12-4-420(F).

AZGFD “may conduct an inspection of a[] . . . license holder’s facility at any time . . . to determine compliance” with captivity standards. Ariz. Admin. Code R12-4-409(L). If violations are documented that “pose[] an immediate threat to the public or the welfare of any wildlife, the Department may immediately order a cessation of operations” or, among other things, require the animals to be surrendered to the agency. Ariz. Admin. Code R12-4-409(M). If the violations do not pose “a threat to the public or the welfare of any wildlife,” the Department should notify the facility, in writing of the violations. Ariz. Admin. Code R12-4-409(N). “If a licensee receives three notices under this subsection for the same condition within a two-year period, the Department shall treat the third notice as a failure to remedy.” *Id.*

If AZGFD investigates the numerous concerns documented below and confirms that The Camel Farm is currently operating in violation of Arizona state law, the agency should take the appropriate state enforcement action independent of whatever action USDA may or may not take. In fact, it is unlikely that USDA will take any action because the federal agency has a long history of failing to take enforcement action even in egregious circumstances. A [2014 Report](#) by the USDA Office of Inspector General (OIG) found that in an effort to reduce a backlog of open investigations, USDA closed at least 59 cases “involving grave (e.g., animal deaths) or repeat welfare violations” by issuing a warning or taking no action. A similar [2010 OIG Report](#) found that “the agency was not aggressively pursuing enforcement actions against violators of AWA and that it assessed minimal monetary penalties against them.” A [2005 OIG Report](#) reached the same conclusion, finding that enforcement actions were often not pursued and that fines were often discounted to such an extent that violators considered the fines “a normal cost of conducting business rather than a deterrent for violating the law.”

Indeed, the USDA recently renewed The Camel Farm’s USDA license despite a litany of unresolved repeat violations, many involving the failure to provide adequate veterinary care. *See* Letter from PETA to USDA requesting non-renewal of The Camel Farm’s AWA License (Dec. 14, 2017)(Ex. B); *see also* [USDA Listing of Certificate Holders](#), (The Camel Farm entry notes the annual renewal date is Dec. 6, 2018). In fact, it is USDA’s [current position](#) that once an exhibitor has an AWA license, that exhibitor does *not* need to demonstrate compliance with the AWA when renewing their license.

* * *

In light of the following apparent violations of state captivity standards, AZGFD must deny The Camel Farm’s zoo license renewal request. Ariz. Admin. Code R12-4-420(F). Renewing The Camel Farm’s license would not be in the best interest of the animals at that facility. *See* Ariz. Admin. Code R12-4-420(F). At a bare minimum, The Camel Farm should be inspected immediately, and cited for these apparent violations. Ariz. Admin. Code R12-4-409(N).

Facilities must provide adequate and prompt veterinary care

The captivity standards for zoo license holders require that “all animals in their care receive proper, adequate, and humane veterinary care as the needs of each animal dictate.” Ariz. Admin. Code R12-4-428(C)(13)(a). In particular, “[e]very animal shall promptly receive licensed veterinary care whenever it appears that the animal is injured, sick, wounded . . . or behaving in a substantially abnormally manner.” *Id.* at (C)(13)(c). Several animals were documented as needing immediate veterinary care. The facility was also cited for failing to maintain a written program of veterinary care. (*See Ex. A*).

a. Multiple Animals Had Overgrown Hooves

A witness observed and documented that multiple animals had overgrown hooves, including a pig, a cow, a goat, and a hinny. (*See Photos 1-7*.) During a February 8, 2018 inspection, the USDA cited The Camel Farm for failing to provide adequate veterinary care to six goats and three pigs with overgrown hooves. (*See Ex. A*). One female goat also had an abnormal gate. *Id.* The USDA noted that the “[f]ailure to appropriately maintain hooves can cause gait abnormalities which can be painful or cause injuries.” *Id.* Inadequate maintenance of hooves, which require regular corrective trimming, can lead to serious health and welfare issues, including lameness, joint problems, and tripping. Overgrown hooves appear to be a pervasive problem at The Camel Farm, as the USDA has often cited the facility for this issue.

b. A Camel Has a Large Growth

A witness observed that a camel named Zo had a large growth on the middle of the chest. (*See Photo 8*.) According to the November 8, 2017 USDA inspection report of The Camel Farm (*Ex. C*), the growth was assessed by their veterinarian and recommendations of surgical resection were given at that time. Yet, during a February 8, 2018 USDA inspection, the facility was unable “was still unable to provide documentation of a physical exam, diagnosis, or treatment plan provided by the attending veterinarian.” (*See Ex. A*). The growth is still present over three months later, and had “numerous flies crawling on it” indicating that the camel has not received prompt veterinary care, contrary to the recommendations of a licensed veterinarian. (*See Ex. A*).

c. A Goat Has Been Non-Weight Bearing on His Front Leg for Over a Year

On February 8, 2018, a USDA inspector cited The Camel Farm for failure to provide veterinary care to an “adult male tricolor goat that had been non-weight bearing on his right front leg during the APHIS inspection on March 9, 2017.” (*See Ex. A*). The most recent veterinary exam for this goat occurred in May 2017. At which time, the vet noted that “more diagnostic work needs to be done (radiographs, bloodwork, appropriate serology).” *Id.* The vet explained to the facility that if they did not want to do additional diagnostics then the goat needed to be euthanized. The Camel Farm has done nothing for this goat.

d. A Sheep Was Thin and Had An Overall Poor Body Condition

On February 8, 2018, a USDA inspector cited The Camel Farm for failure to provide veterinary care to a “brown and black, adult, female sheep [that] was observed to be excessively thin, with protruding hip bones, spine, and ribs.” (*See Ex. A*). The USDA inspector noted that “[t]he bones of her spine, hips, and each rib were easily felt by both

APHIS inspectors upon palpation” and “[s]he had a rough, unthirfty hair coat with multiple patches of hair loss along her back and right and left sides.” *Id.* The USDA noted that “[p]oor body condition can be an indication of health issues, including parasitism, poor dentition, malnutrition, and systemic disease.” *Id.* This was a repeat violation.

Facilities must provide adequate shelter

Zoo license holders are also required to provide “[s]ufficient shelter appropriate to protect animals from normal climatic conditions throughout the year.” Ariz. Admin. Code R12-4-428(E). This includes providing “[s]ufficient shade to prevent the overheating or discomfort of any animal.” *Id.* A witness observed and documented that most of the enclosures had only small shade covers, which do not protect the animals from weather conditions such as rain or wind. (*See* Photos 1, 5-6, 9-12.) On February 8, 2018, a USDA inspector cited the facility for failing to provide sufficient shade to “two adult camels, ‘Freya’ and ‘Alexa.’” (*See* Ex. A). The USDA inspector noted that the shade structure only “provided two small strips of shade inside the enclosure,” and that during the inspection it was 81 degrees Fahrenheit. *Id.* The area where the facility is located can also receive a significant amount of wind throughout the year, with gusts reaching up to 48 mph, which can stir up sand and debris. (*See* Ex. D, 2017 weather conditions.)

Facilities must provide adequate drainage of excess water

The captivity standards require that “[a] sanitary and human method shall be provided to rapidly eliminate excess water from the facility.” Ariz. Admin. Code R12-4-428(C)(6). A witness observed and documented standing water and mud in the enclosure confining a cow and goat, and in another enclosure confining goats. (*See* Photos 1-3 and 12-13.) The excess water and mud was around the self-filling water bowl in the enclosure confining the goats, forcing the animals to walk through the water and mud in order to drink. On February 8, 2018, a USDA inspector cited the facility for having “pools of standing water around the water receptacle in an enclosure containing one zebu and two sheep” and in an enclosure with two water buffalo. (*See* Ex. A.) The USDA inspector noted that these animals “were unable to drink from the receptacle without standing in the mud.” *Id.* The USDA inspector also explained that “[s]tanding water can pose a health risk to the animals as it can contain bacteria and parasites.” *Id.* Not only can standing water contain bacteria and parasites that could be transmitted to the animals, but according to wildlife veterinarian Christine Capaldo these conditions have the potential to cause foot rot, because chronically wet feet can cause irritation of the skin, allowing bacteria to invade the tissues, which can lead to dermatitis and/or lameness.

Facilities must be kept in a sanitary condition

Zoo license holders are required to keep the facilities “sanitary and regularly cleaned as the nature of the animal requires” including removing excrement “from the primary enclosure facility as often as necessary to prevent contamination, minimize hazard of disease, and reduce unseemly odors.” Ariz. Admin. Code R12-4-428(C)(5). A witness observed and documented that multiple enclosures contained excessive feces, including in the enclosure confining a cow and

goat, and the enclosure confining an eland. (See Photos 1-3, and 12.) According to Dr. Capaldo, such conditions can attract flies and cause disease transmission, skin irritation, and infections.

On February 8, 2018, a USDA inspector cited The Camel Farm for unsanitary conditions in four different enclosures. In one enclosure housing seven goats, the USDA inspector found “[a] gopher carcass,” which the inspector noted “has the potential to transmit disease to the regulated animals.” (See Ex. A). Another enclosure with twelve goats had “a bundle of baling twine on the ground,” which the inspector noted could easily be consumed by the animals. *Id.* A separate enclosure with five goats also had baling twine in the enclosure. *Id.* In a barn housing nine goats, the USDA inspector cited the facility for having “an accumulation of cobwebs . . . in the corners of the enclosure and on the feeders,” noting that this “may be an indication of substandard husbandry practices.” *Id.*

Facilities must be kept in good repair

Zoo license holders are required to maintain the facilities “in good repair to protect animals from injury.” Ariz. Admin. Code R12-4-428(C)(1)(c). On February 8, 2018, a USDA inspector cited The Camel Farm for having thirteen different enclosures in various states of disrepair, all of which posed a risk of injury to the animals in those enclosures. (See Ex. A.) The USDA noted that The Camel Farm needed “[a] system of facility monitoring and maintenance” to ensure all animal enclosures were “structurally sound and in good repair to protect the animals from injury and/or escape.” *Id.* The USDA inspector issued the following citations:

- The chain link fencing in an enclosure housing nine goats was not fully secured “to the ground, creating a gap” that had “sharp points at the bottom of the fence . . . facing into the enclosure.” *Id.*
- The ceiling in the coati enclosure had several broken and loose metal wires “with sharp points . . . protruding into the enclosure.” *Id.* The coati’s nesting box had “exposed screw tips that could injure” the animal. *Id.*
- The enclosure for a male camel, Humphry, “consisted entirely of four metal cables that were strung horizontally” with the bottom most strand being so “loose in some areas” that it was “either hanging low or entirely on the ground.” *Id.* Humphry’s enclosure also had “wire mesh surrounding the metal cable” that was allowed “to curl and fold over, creating gaps and sharp points.” *Id.*
- There was a broken wood board with “jagged and splintered” edges hanging down into an enclosure housing sheep and goats. *Id.*
- An enclosure with eighteen sheep “had broken metal fencing with sharp points and broken wooden boards with jagged, splintered edges.” *Id.*
- There was “an exposed nail head” in the night house for two pigs. *Id.*
- “An enclosure housing one Dromedary camel, ‘Coco,’ contained sharp points and had fencing in disrepair.” *Id.*
- The enclosures for a Dromedary camel, ‘Pinkie,’ and for two Dromedary camels, ‘Freya’ and ‘Alexa’ had damaged fencing wire that was sharp and pointing into the enclosures. *Id.*
- A portion of the metal fencing for an enclosure with seventeen sheep “was bowing out of the base of the pen” creating a large gap. *Id.* In the same enclosure, “one of the metal legs

stabilizing the shade structure was severely rusted, creating sharp edges which could injure the animals.” *Id.*

- “In an enclosure housing seven goats a portion of the wire fencing was in disrepair” causing “sharp points protruding toward the animals that could cause injuries.” *Id.* The same enclosure had an exposed screw. *Id.*
- The barn in an enclosure with nine goats “had rust along the lower parts of the metal walls, which extended up the wall at least 10 inches in height in some areas” exposing “jagged, splintered” wood. *Id.* The same barn also had a hole in the floor that was “several feet long and approximately 2 feet deep.” *Id.*
- The chain link fencing in an enclosure with fifteen goats had gaps and sharp edges. *Id.*

Facilities must provide water

The captivity standard required that “[e]ach animal shall be supplied with sufficient potable water to meet its needs.” Ariz. Admin. Code R12-4-428(C)(3). In addition, “[w]ater shall be readily available and monitored at least once daily or more often when the needs of the animal dictate.” *Id.* On February 8, 2018, a USDA inspector cited the Camel Farm for failing to provide “[a] lactating, adult female camel, ‘Camela,’ and her nursing baby” with “access to drinking water.” (*See Ex. A.*) The USDA inspector noted that when the camel was finally provided water “she was drinking and searching for water sources for approximately 8 minutes.” *Id.*

Facilities must maintain records on the animals in their possession

A zoo license holder is required to “[m]aintain records of all wildlife possessed under the license for a period of three years following the date of disposition.” Ariz. Admin. Code R12-4-420(J)(11). On February 8, 2018, a USDA inspector cited The Camel Farm for being “unable to locate any animal records,” including “acquisition and disposition” records for the animals at the facility. (*See Ex. A.*)