

June 14, 2017

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Via e-mail: [REDACTED]

Dr. Ms. Kirkpatrick:

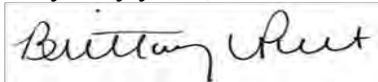
I am writing on behalf of People for the Ethical Treatment of Animals, Inc. (PETA) to ask that you take administrative action against numerous veterinarians in Oklahoma who have apparently violated their ethical duties by issuing Certificates of Veterinary Inspection (CVI) to persons who exported infant big cat cubs who were unweaned and prematurely separated from their mothers, contrary to the welfare of the animals.

As explained in more detail in the attached Appendix, public records reveal that veterinarians in Oklahoma facilitated the premature separation of over 30 big cat cubs, who were four weeks-old or less, from their mothers by repeatedly signing off on their export from Oklahoma via CVIs. According to numerous individual and institutional experts, big cats who are prematurely removed from their mothers will almost certainly be doomed to suffer from various physical and mental maladies, and transporting these immuno-deficient cubs poses a grave risk that they will become ill or die.

Veterinarians who issued these CVIs apparently violated the AVMA's Principles of Veterinary Medical Ethics by failing to first consider the needs of the patient and were undeniably without compassion and respect for animal welfare and human health. Furthermore, these veterinarians apparently practiced veterinary medicine in a manner that demonstrates a willful or careless disregard for the health, welfare, and safety of a patient in apparent violation of Board regulations.

Please investigate the veterinarians who issued these CVIs and hold them accountable for any administrative violations that your investigation reveals.

Very truly yours,



Brittany Peet
Director of Captive Animal Law Enforcement
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APPENDIX

I. Veterinarians in Oklahoma are Issuing Certificates of Veterinary Inspection that Permit the Export of Big Cat Cubs Who Were Prematurely Separated From Their Mothers.

Hundreds of big cats are being bred by laypersons and unaccredited roadside zoos across the United States, including in Oklahoma, without regard for lifetime care or species preservation, and then are forcibly and prematurely separated from their mothers at only a few weeks—sometimes days or hours—old. These cubs are then often sold or given away to commercial exhibitors, many of whom use the animals in “play time” encounters, during which humans (including children) are permitted to have direct contact with the animals. During these encounters, the animals are typically handled excessively, not allowed to rest, and placed in jeopardy of contracting diseases, while the handling public is put at risk of scratches, bites, and other injuries by the cubs. Exhibitors typically discard the cubs to other shoddy facilities or cramped cages once the animals become too dangerous to the public at around twelve weeks-old. Some of the cubs will never reach adulthood because of poor nutrition, illness, physical abuse, or neglect, and most will suffer life-long behavioral issues as a result of being prematurely separated from their mothers.

It is abhorrent to think that veterinarians, who are ethically mandated to provide competent veterinary care “*with compassion and respect for animal welfare*” and who “should *first* consider the needs of the patient to prevent and relieve ... suffering ... while minimizing pain or fear,”¹ would play any role in this treacherous cycle of animal abuse. Yet some veterinarians routinely facilitate the premature separation of infants from their mothers and maintain this industry of mistreatment by issuing Certificate of Veterinary Inspection (CVI)² forms, the subject of which are patients who were removed prematurely from their mothers without medical necessity.

According to PETA’s research, most of the CVIs for big cat cubs shipped out of the state of Oklahoma between January 2013 and May 2017 were signed by [REDACTED], and most of the shippers worked for, or were otherwise connected to the Greater Wynnewood Exotic Animal Park³ in Wynnewood, Oklahoma (G.W. Zoo). The G.W. Zoo breeds big cats nonstop and charges visitors up to \$90 to “[Play with \[the\] Baby Animals](#)” for six minutes. Dr. [REDACTED] alone has issued over thirty CVIs to the G.W. Zoo for cubs who were *four weeks-old or less*, and accordingly facilitated the zoo to prematurely separate cats as young as *seven days old* from their mothers.⁴ Many of the big cats who were exported by G.W. Zoo were used in similar gimmicky encounters with the public, including a one-week old tiger named Luna

¹ See American Veterinary Medical Association, [Principles of Veterinary Medical Ethics of the AVMA](#), avma.org, (Principle I and annot. a to Principle I (last visited Mar. 28, 2017)); see also Okla. Admin. Code 775:10-5-30(2) (“a demonstration of willful or careless disregard for the health, welfare or safety of a patient” is considered unprofessional conduct constituting grounds for disciplinary action by the Board).

² A CVI is an official document issued by a veterinarian indicating the health status of an animal. Most states, including Oklahoma, prohibit the importation of an animal without an accompanying CVI. See e.g. Okl. Stat. tit. 2, § 6-151 (health certificate required for shipment of livestock into state); *id.* § 6-150 (defining “livestock” as “any animal or bird to be imported into the State of Oklahoma for any purpose.”)

³ See PETA, [Factsheet: The Greater Wynnewood Exotic Animal Park](#).

⁴ See Ex. 1, CVIs; Ex. 2, Seven Day-Old Big Cat.

who was forced by an exhibitor in Florida to swim in a swimming pool with members of the public in a paid "Baby Tiger Swim Program" that was ultimately found to violate federal law.⁵

By signing off on CVIs like these, Dr. [REDACTED] and other veterinarians are perpetuating the interstate transport of these infants, and the unethical, unhealthy, and traumatic separation of infant from mother—an act that by design prioritizes profit and fails to first consider the needs of the patient and to prevent and relieve suffering while minimizing pain or fear, and is undeniably without compassion and respect for animal welfare.

II. Individual and Institutional Experts Advise Against Prematurely Separating Big Cat Cubs from Their Mothers.

Individual and institutional experts agree that big cat mothers should be permitted to rear their infants. According to the late Dr. Henry M. Richardson—a captive wildlife veterinarian with over forty years of experience observing, treating, and providing care for a wide variety of captive wild animals, including big cats—

[i]t is a basic tenet of mammalian biology that offspring are reared by their dams, including a relatively lengthy period of nursing and weaning and learning essential skills for adulthood. Premature separation of mothers and their offspring often results in poor health and behavioral abnormalities in the infants, some of which can persist throughout a hand-reared infant's lifetime. ... [T]here is general consensus that in legitimate captive propagation programs the best practice is to avoid disturbing mothers and newborns (physically or even audibly) so that they can bond and establish a routine for proper physical and behavioral development.⁶

Zoo accrediting organizations such as the Association of Zoos and Aquariums (AZA), which represents over 230 institutions in the U.S. and overseas, and the European Association of Zoos and Aquaria (EAZA), which represents over 350 institutions from 44 countries throughout Europe and the Middle East, concur.⁷ The EAZA explains that

⁵ See Ex. 3, Oklahoma Department of Agriculture, Food, and Forestry, CVI No. 2018533 (May. 28, 2015) (signed by Dr. [REDACTED]); [Stearns Zoological Rescue & Rehab Center, Inc.](#), AWA Docket No. 15-0146, at 6 (U.S.D.A. Feb. 15, 2017) ("[I]t is my determination that Stearns Zoo's baby tiger swim sessions failed to provide sufficient distance and/or barriers between the animals and the public as required by the applicable regulations at 9 C.F.R. § 2.131(b)(1), 2.131(b)(2)(i), 2.131(c)(1), and, further, that the baby tiger swim program is not consistent with the requirements of 9 C.F.R. § 2.131(c)(3) that '(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.' Therefore, this practice must **cease and desist.**" (footnote omitted)).

⁶ Declaration of Dr. Henry M. Richardson ¶ 6 (2012), in Humane Society of the U.S. et al., [Petition for Rulemaking to Prohibit Public Contact with Big Cats, Bears, and Nonhuman Primates](#) 66-68 (2013); see also Ex. 4, Expert Opinion of Heather Rally, D.V.M., at 1 ("Routine separation of captive wild carnivores from their mothers ... is no longer an accepted husbandry practice in respected zoological facilities.").

⁷ See Association of Zoos and Aquariums Tiger Species Survival Plan, [Tiger \(*Panthera tigris*\) Care Manual](#) 66 (Maya Seaman et al. eds. 2016) ("Cubs should be hand-raised only when parent-rearing is not possible due to maternal neglect or health reasons."); Association of Zoos and Aquariums Lion Species Survival Plan, [Lion \(*Panthero leo*\) Care Manual](#) 85 (Hollie Colahan, ed. 2012) ("The AZA Lion SSP does not recommend elective hand rearing of cubs."); EAZA, [Standards for the Accommodation and Care of Animals in Zoos and Aquaria](#) (Sept. 27, 2014), at 4.

Natural rearing is preferred over hand rearing [of animals] whenever possible. EAZA members should minimize the need for hand rearing by providing appropriate accommodation and care for the individual animals and when applicable the social group If hand rearing is decided upon it should be aimed at raising the individual(s) such that it develops as much species-specific behavior as possible and the animal(s) should be introduced back to its conspecifics as soon as possible. EAZA members should focus any communication related to hand rearing on the biological considerations and purpose of hand rearing the animal, and avoid anthropomorphic interpretations for the purpose of commercial gain.⁸

In most mammals, premature separation of an infant from the animal's mother can deprive the young animal of stimulation that is essential to the development of normal species behavior, including the regulation of emotion, social interaction, and maternal and sexual behaviors.⁹ It also interrupts the natural weaning process, depriving the animal of essential, nutrient-rich milk the consumption of which is imperative for the health of the animal, and the natural dispersal process, disrupting the development of essential survival skills, which will ultimately make the release of the animal into the wild virtually impossible and therefore undermines any attempt to justify the supposed objective of the separation as a legitimate conservation method.

Big cat cubs are born fragile and completely dependent on their mother's care, warmth, and milk to survive.¹⁰ According to the late Dr. Ronald Tilson—a doctor of Ecology who had published over three hundred scientific articles, and an expert on big cats, particularly tigers—“neonatal mortality is highest (about 30%)” in both wild and captive tigers “during the first 30-90 days of a cub's life, “which is why legitimate conservation propagation programs allow dams and their cubs to be left undisturbed after birth to allow the mother and offspring to bond and establish a feeding routine.”¹¹ Indeed, “accredited zoos generally do not even put a mother and cubs on exhibit until the cubs are at least 12 weeks of age due to the potential impacts of stress and/or accidents from exhibition.”¹²

Big cats typically remain with their mothers in the wild for about two and one-half to three years, and tiger experts with hundreds of years of experience in captive propagation combined agree that it is normally in a cub's best interest to stay with its mother until the species-typical age of dispersal (i.e., 2.5-3 years).¹³ Separation of big cats from their mothers, especially before the age

⁸ EAZA, *supra* note 7, at 4.

⁹ See M. Elsbeth McPhee & Kathy Carlstead, *The Importance of Maintaining Natural Behaviors in Captive Mammals*, in *Wild Mammals in Captivity* 303-13 (Debra Kleiman et al., eds 2010).

¹⁰ Declaration of Ronald Tilson, Ph.D ¶ 11 (2012) in *Humane Society of the U.S. et al., supra* note 6, at 57-62.

¹¹ *Id.*

¹² *Id.*

¹³ Declaration of Ronald Tilson, Ph.D. ¶ 8; see also Kevin Seymour, *Panthera onca*, *Mammalian Species*, No. 340, Oct. 26, 1989, at 1, 4 (jaguar cubs “remain with their mother for 1.5 to 2 years”); Paul Krausman & Susana Morales, *Acinonyx jubatus*, *Mammalian Species*, No. 771, Jul. 15, 2005, at 1, 3 (cheetah cubs “may not separate from their mother until they are 15-17 months old”); Vratislav Mazák, *Panthera tigris*, *Mammalian Species*, No. 152, May 8, 1981, at 1, 4 (tiger cubs “usually separate from their mother at about year 2”); Sarah Haas et al., *Panthera leo*, *Mammalian Species*, No. 762, Jul. 15, 2005, at 1, 4, 6 (lion cubs “are raised communally after 4-6 weeks of age” then male lions “generally leave their natal pride when 2-4 years old” and female lions generally “are incorporated into their natal prides”).

of natural weaning, is no longer an accepted husbandry practice in legitimate zoological facilities,¹⁴ and the natural age of complete weaning for many big cat species ranges from five to eight months, depending on species.¹⁵ Premature separation before complete weaning often leads to nutritional deficiencies and compromises the infant's immune system because infant mammals are afforded protection from antibodies, proteins, and immune cells from their mother's milk.¹⁶ As recognized by the USDA, improper diets "may lead to growth problems or metabolic bone disease," the latter of which "[g]rowing tigers are particularly susceptible."¹⁷ Bottle feeding big cats can also be dangerous because the animals can aspirate the fluid and develop pneumonia.¹⁸

Human-reared cubs commonly weigh less than cubs who were raised by their mothers, and often suffer from digestive issues because of their consumption of formula and because of unhygienic environments, which could potentially result in infection.¹⁹ Premature separation also inevitably results in premature and excessive exposure to a multitude of pathogens to which the animals' immune systems are naïve because the mother would normally prevent the accidental introduction of environmental pathogens into the den.²⁰

The particular vulnerability of big cat cubs who are four weeks of age and younger has led the USDA to issue an official policy statement announcing that exhibitors who do not house these animals "in a controlled, sanitary, temperature-controlled environment and do not handle such animals in a manner that does not expose them to any form of public contact, including public feeding and handling, are considered noncompliant with the veterinary care and handling requirements of the Animal Welfare Act regulations."²¹ Indeed, the USDA advises in the statement that the animals "*should be housed with their mother for as long as possible after birth to promote good health.*"²²

Finally, big cat cubs who are prematurely separated from their mothers often do not acquire species-typical behaviors, such as those related to reproduction, and are also susceptible to behavioral disorders.²³ Carole Baskin—the founder of Big Cat Rescue who has over thirty years of experience in large felid husbandry—has seen such behavioral disorders first hand. Her facility is home to a tiger who was separated from his mother soon after birth and still sucks on

¹⁴ Expert Opinion of Heather Rally, D.V.M., at 1; AZA Tiger Care Manual, *supra* note 7, at 85; AZA Lion Care Manual, *supra* note 7, at 66.

¹⁵ See, e.g., Seymour, *supra* note 13 at 4 (jaguar cubs "begin to take meat around 10 to 11 weeks, although suckling may continue for 5 to 6 months"); Krausman & Morales, *supra* note 13, at 3 (cheetah cubs "are weaned at 3-6 months"); Mazák, *supra* note 13, at 4 (tiger cub "suckling time lasts 3 to 6 months"); Haas *et al.*, *supra* note 13, at 4, 6 (lion "cubs are weaned at ca. 8 months").

¹⁶ See e.g. USDA, [Handling and Husbandry of Neonatal Nondomestic Cats](#), at 1 (March 2016) ("Neonatal nondomestic cats" four weeks of age or younger "are not able to thermoregulate and lack a fully functioning immune system to fight off disease and infection. Neonates will obtain most immunity from their mother, primarily through suckling antibody-rich colostrum (first milk)." (citations omitted)).

¹⁷ See Ex. 5, USDA, Inspection Report No. 358151311570985, Connie Tibbs (Dec. 24, 2015).

¹⁸ AZA Lion Care Manual, *supra* note 7, at 67; *id.* at 88 ("Cubs held in an upright or head back position during feeding are more prone to aspiration and death.").

¹⁹ See Declaration of Ronald Tilson, Ph.D. ¶ 9.

²⁰ Expert Opinion of Heather Rally, DVM, at 1.

²¹ [Handling and Husbandry of Neonatal Nondomestic Cats](#), *supra* note 16, at 1 (emphasis added).

²² *Id.*

²³ Declaration of Ronald Tilson, Ph.D. ¶ 9.

his paw two decades later, a behavior that is “common in hand-reared cats and is likely a coping mechanism for maternal deprivation.”²⁴ Acquiring disorders like these and/or failing to acquire species-typical behaviors ensure that the animals will be permanently held in captivity, rendering illegitimate any claim by exhibitors that the importation or exportation of an animal who was prematurely separated from its mother will benefit conservation efforts.

III. Transporting Big Cats Cubs Can Threaten the Animals’ Lives.

There are many health concerns associated with transporting a big cat cub. According to Dr. Heather Rally—a wildlife veterinarian who completed training on carnivores at the Wild Animal Sanctuary and the Performing Animal Welfare Society—“the transport of cubs, particularly those under the natural age of weaning, between facilities should be considered unethical and inhumane unless absolutely necessary for the animal’s health and wellbeing.”²⁵ Tiger expert Dr. Tilson likewise acknowledges that “[t]here is probably no other recognized event that is considered more dangerous for a big cat than being transferred from a place of familiarity to one of unknown familiarity.”²⁶ Indeed, “[b]ig cat transfers are well recognized within the professional care fraternity *as one, if not the most, leading cause of premature death in tigers.*”²⁷

Specifically, the transportation process can interrupt a big cat cub’s normal 19+ hours sleep cycle, which can result in exhaustion, anxiety, irritability, and associated physiological consequences.²⁸ Travel conditions and noise also often cause stress, anxiety, and diarrhea in big cats, especially cubs, which compromise their immune systems and make them more susceptible to contracting disease.²⁹ Furthermore, young cubs—especially those who are days or weeks old—lack thermoregulatory mechanisms to control their body temperature and have minimal body fat, which puts them at great risk of becoming hypothermic and hypoglycemic when forced to travel without their mother.³⁰ An infant cub with hypothermia is further put at risk of developing pneumonia or sepsis.³¹

VI. Conclusion

Facilitatting premature maternal separation in the face of these facts is unethical as being devoid of compassion and respect for animal welfare and human health, and a failure to first consider

²⁴ Declaration of Carole Baskin ¶ 5 (2012), in Humane Society of the U.S. et al., *supra* note 6, at 69-71.

²⁵ Expert Opinion of Heather Rally, D.V.M., at 2.

²⁶ Declaration of Ronald Tilson, Ph.D. ¶ 12.

²⁷ *Id.* (emphasis added).

²⁸ *Id.*

²⁹ *Id.*

³⁰ See, e.g., Laurie J. Gage, et al., [Care of Orphaned Native Birds and Mammals](#), Management of the Neonate, Merck Veterinary Manual (because animals without their mothers "initially cannot maintain or regulate their body temperature, supplemental heat should be provided with heating pads, hot water bottles, incandescent light bulbs, or brooders."); *Handling and Husbandry of Neonatal Nondomestic Cats*, *supra* note 16, at 1; AZA Lion Care Manual, *supra* note 7, at 82 (advising that supplemental heat may be necessary for lion cubs where the mother is not spending most of her time in the den); AZA Tiger Care Manual, *supra* note 7, at 66 (advising that cubs may need to be maintained in a warm or cool environment, as required, to regulate temperature); Harmony B. Frazier, et al., *Management of Neonatal Mammals*, in *Zookeeping* 203, 208 & 211 (Mark D. Irwin et al. eds. 2013).

³¹ Harmony B. Frazier, et al., *supra* note 30, at 211.

the needs of the patient. The big cats who are being exported from Oklahoma are being removed from their mothers in the pursuit of profit, not in order to protect the health of them or their mother. A veterinarian should be skeptical if a person attempting to export an infant big cat claims that premature separation was necessary in the interest of the health and wellbeing of the infant or mother.

Dr. Rally agrees and offers this analysis of this serious issue, and a veterinarian's obligation when confronted with a CVI the subject of which is an infant cub:

Health certificates for transport of underage cubs between facilities are often signed by veterinarians without consideration for the circumstances of the transfer, the welfare of the cub or mother, or the long-term consequences for the health of the species. *The responsibility of the veterinarian is not to the facility in question, but to the health and welfare of the patients in their care.* When considering the implications of an animal transfer veterinarians are not only responsible for evaluating the immediate health status of the animal, but also for acting preemptively to safeguard the health and wellbeing of that animal during and after the transfer. *This obligation includes a **refusal** to issue or endorse veterinary travel certificates for cubs under weaning age **unless absolutely necessary for the animal's health and wellbeing.***³²

Please ensure that veterinarians in Oklahoma uphold their ethical and professional obligations and stop this crisis by taking administrative action against those veterinarians who issued the CVIs in Ex. 1.

³² Expert Opinion of Heather Rally, D.V.M., at 4 (emphases added, bold text emphasized in original using italicized text).