

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.)

June 14, 2017

 Robert Gibbens, D.V.M.
 Director, Animal Welfare Operations
 USDA/APHIS/AC Western Region

Via e-mail: [REDACTED]

 Re: Request for Investigation of Interstate Receipt of Neonatal Tiger Cubs by
 A Walk on the Wild Side

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Steven Higgs, dba "A Walk on the Wild Side" (license number 92-C-0159) for arranging for the interstate transfer of two 3-week-old tiger cubs, a repeat violation of the Animal Welfare Act (AWA)'s handling protocol for neonatal nondomestic cats.

According to a May 11 an Oklahoma Department of Agriculture, Food and Forestry Certificate of Veterinary Inspection, Walk on the Wild Side arranged for the transfer of two 3-week-old tiger cubs from the Greater Wynnewood Exotic Animal Park (aka "G.W. Zoo") to Higgs, in Oregon (*see* attached).

The USDA has issued an official policy statement acknowledging that neonatal nondomestic cat cubs 4 weeks old or younger "have special handling and husbandry needs" because cubs of this age "are not able to thermoregulate and lack a fully functioning immune system to fight off disease and infection." In addition, they "should be housed with their mother for as long as possible after birth to promote good health," and "[u]ntil these animals can thermoregulate and are immunocompetent, they should be housed in the controlled environment..." (*See* USDA, "[Handling and Husbandry of Neonatal Nondomestic Cats](#)," March 2016.) Licensees who ignore these guidelines and allow neonatal cubs to be exposed "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" [*emphasis added*] *id.*

Removing cubs from their mothers prematurely and subjecting them to the stresses and excessive handling inherent to transport apparently violates 9 C.F.R. § 2.131(b)(1) and (c)(3), which require that "[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 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."

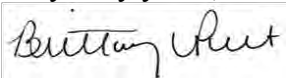
The USDA acknowledged the risks inherent in shipping infant cubs when it previously cited Higgs on May 23, 2016 for causing unnecessary stress and discomfort to the cubs for his receipt of the animals. The inspection report stated:

It has been determined that transporting neonatal (<4 weeks old) nondomestic cats is not consistent with safe handling and protecting them from harm. The moving of the enclosure and the noise of the planes and the crowds can cause behavioral stress and discomfort. In addition, neonatal animals are not considered to have competent immune systems until they have had a series of vaccinations. They were potentially exposed to pathogens from other animals and people on the planes and in the airports. Correct by no longer transporting neonatal animals, from this point on.

This violation apparently remains uncorrected. Please inspect the two tiger cubs shipped in May, as well as their veterinary records, and ensure that they are receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

Please hold Steven Higgs and all responsible parties 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, Esq.
Director, Captive Animal Law Enforcement

cc: Dr. Laurie Gage, Big Cat and Marine Mammal Specialist ([REDACTED])