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June 14, 2017

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

Via e-mail: [REDACTED]

Re: Request for Investigation of Interstate Receipt of Neonatal Lion Cubs by
 Special Memories Zoo

Dear Dr. Goldentyer:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Gene Wheeler, dba Special Memories Zoo (license number 35-B-0198) for arranging for the interstate transfer of three 2-week-old lion cubs, in apparent violation of the Animal Welfare Act (AWA)'s handling protocol for neonatal nondomestic cats.

According to the attached Oklahoma Department of Agriculture, Food and Forestry Certificates of Veterinary Inspection, Special Memories Zoo arranged for the transfer of two 2-week-old lion cubs from the Greater Wynnewood Exotic Animal Park (aka "G.W. Zoo") to Wheeler, in Wisconsin, on January 30. Special Memories Zoo arranged for the transfer of a third 2-week-old lion cub from G.W. Zoo on April 17.

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.*

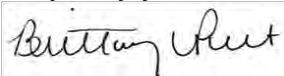
Removing cubs from their mothers prematurely and subjecting them to the stresses and excessive handling inherent to transport apparently violates 9 C.F.R. § 2.131(b)(1) and (c)(3), which require that "[h]andling of all animals shall be done as expeditiously and carefully as possible in a manner that 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 Stearns Zoological Rescue and Rehab was cited on February 16, 2017, for subjecting 3-week-old bobcats to interstate transport to Steven Higgs (dba "A Walk on the Wild Side" in Oregon), who had been cited on May 23, 2016, for his role in causing unnecessary stress and discomfort to the cubs for his receipt of the animals. Both inspection reports stated that "[i]t has been determined that transporting neonatal (<4 weeks old) nondomestic cats is not consistent with safe handling and protecting them from harm" and that the transport can cause "stress and discomfort."^{1,2} The Stearns inspection report added that "[b]ecause of their limited immunity, their health is at risk if they are exposed to potential pathogens. Transport at such a young age could expose them to pathogens that their immune system is not able to handle."³

Please inspect these lions, 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 Gene Wheeler 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
[REDACTED]

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

¹See USDA Inspection Report, Stearns Zoological Rescue and Rehab, License No. 58-C-0883, February 16, 2017.

²See USDA Inspection Report, Steven Higgs, License No. 92-C-0159, May 23, 2016.

³See USDA Inspection Report, Stearns Zoological Rescue and Rehab, License No. 58-C-0883, February 16, 2017.