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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 Tiliger Cub by
 Woody's Menagerie and Apparent Exhibition During License Suspension

Dear Dr. Goldentyer:

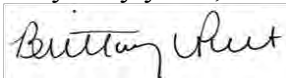
I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Gregg and Karen Woody, dba Woody's Menagerie ("Woody's"; license number 33-C-0218), for the following apparent violations of the Animal Welfare Act (AWA), described in detail in the attached appendix:

- According to an Oklahoma Department of Agriculture, Food and Forestry Certificate of Veterinary Inspection (CVI), Woody's Menagerie in Illinois was the recipient of a 4-week-old tiliger cub shipped from the Greater Wynnewood Exotic Animal Park (aka "G.W. Zoo") in Oklahoma. (*See Exhibit 1.*) Unnecessarily removing infant cubs from their mothers and subjecting them to the stress of transport appears to violate the AWA's handling regulations.
- Woody's was also the recipient of a 4-month-old tiger shipped from G.W. Zoo to a temporary exhibition in Texas, on or about January 30, during which time Woody's AWA license was suspended and had not been reinstated. (*See Exhibit 2.*)
- Additional CVIs from the Illinois Department of Agriculture demonstrate that Woody's exhibited regulated animals while its license was suspended. (*See Exhibits 3–5.*)

Please ensure that all animals at Woody's are handled in accordance with the AWA, including investigating whether Woody's violated an October 20, 2016, consent decision and order that mandated it to cease and desist from violating the AWA. Please hold Gregg and Karen Woody and all other 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]

Appendix

a. Interstate Shipment of Neonatal Tiliger Cub

According to a March 22 Oklahoma CVI, Woody's arranged for the transfer of a 4-week-old "taliger" [*sic*] cub from AWA licensee G.W. Zoo to Woody's site in Illinois. (*See* Exhibit 1.)

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 this tiliger, as well as his veterinary records, and ensure that he's receiving adequate veterinary care pursuant to 9 C.F.R. § 2.40.

b. Apparent Exhibition During License Suspension

Pursuant to an October 20, 2016, consent decision and order, Woody's AWA license was suspended for 90 days beginning on October 25 "and continuing thereafter until such time as respondents have demonstrated to APHIS that they are in compliance with the Act and the Regulations and Standards."⁴ PETA contacted the USDA's Eastern Regional Office in Raleigh, North Carolina, on February 17, and confirmed that Woody's license had not been reinstated. PETA previously reported to the USDA that

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.

⁴Consent Decision and Order, *In re: Woody's Menagerie*, AWA Dockets 15-0147, 15-0148, and 15-0149, October 20, 2016.

despite this, Woody's engaged in illegal exhibition at an event in Texas from February 3 to 19. (See complaint number AC17-279.)

An additional CVI from the state of Oklahoma shows that Woody's arranged for the transfer of a 4-month-old tiger from G.W. Zoo to its exhibition site in Texas on or about January 30, 2017. (See Exhibit 2.) Illinois CVIs show that on or about January 30, Woody's transferred 19 regulated animals—five dogs, four pigs, two ligers, two armadillos, a lynx, a coatimundi, a kinkajou, a fennec fox, a cougar, and a kangaroo—to the same exhibition. (See Exhibits 3–5.)

By transporting and exhibiting animals during the aforementioned dates at the Texas exhibition site, Woody's violated the October 20, 2016, consent decision and order, which mandated that Woody's, "their agents and employees, successor and assigns, directly or through any corporate or other device ... *cease and desist* from violating the Act and the Regulations and Standards" [*emphasis added*].⁵ This reinforces PETA's previous report that Woody's was in violation of 9 C.F.R. § 2.1, requiring that "[a]ny person operating or intending to operate as a[n] ... exhibitor ... must have a valid license," and 7 U.S.C. §§ 2134, requiring that "[n]o ... exhibitor shall ... transport ... in commerce ... for exhibition ... unless and until such ... exhibitor shall have obtained a license from the Secretary and such license shall not have been suspended or revoked."

Although it appears that Woody's license was reinstated, according to the USDA's most recent list of active AWA licensees, please keep in mind that "[a]ny person whose license has been suspended or revoked shall not buy, sell, transport, exhibit, or deliver for transportation, any animal during the period of suspension or revocation," 9 C.F.R. § 2.10(c), and that "[a] license will not be issued to any applicant who ... [h]as had a license revoked or whose license is suspended," *id.* § 2.11(a)(3). The evidence that Woody's exhibited animals during its license suspension period is overwhelming. Please investigate this matter and hold Woody's fully accountable for any and all violations that you discover.

⁵*Id.*