

October 20, 2021

Lt. Victor Zavala
 Animal Control Supervisor
 Clark County Animal Control

PEOPLE FOR
 THE ETHICAL
 TREATMENT
 OF ANIMALS
 FOUNDATION

Via email

Re: Request to Prohibit SeaQuest Las Vegas from Possessing Sloths

Washington
 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

Dear Lt. Zavala,

I am writing on behalf of PETA to request that the Clark County Animal Control (CCAC) deny any future requests from SeaQuest Las Vegas (SeaQuest) (permit no. A21-079772) to acquire and possess sloths in light of the premature death of another sloth at this facility—the second sloth to die under SeaQuest Las Vegas’s care.

According to recently obtained public records from the CCAC, a two-year-old sloth died at SeaQuest Las Vegas on April 8, 2021. Ex. 1 (Necropsy). This sloth was shipped from SeaQuest’s Texas location to the Las Vegas location in November 2020, which means he was only at SeaQuest Las Vegas for approximately 5 months before dying. Ex. 2 (Import Permit); Ex. 3 (Activity Record A19-057139). The necropsy documented that this sloth “developed reduced food intake, was subsequently found hypothermic, and then minimally responsive on the floor of the enclosure” and “developed twitching behavior.” Ex. 1. According to wildlife veterinarian, Dr. Monica Bando, while the necropsy does not identify a cause of death, the pathology raises infectious disease concerns, such as encephalomyocarditis virus and herpesvirus, and the report states that this sloth presented with similar symptoms as another sloth who died at this facility, raising further concerns about a shared source of infection or shared exposure to significant deficiencies in husbandry and management. *Id.* The first sloth to die at SeaQuest Las Vegas—Flash—was acquired from an exotic animal breeder in Florida in November 2019 and died seven months later after exhibiting weakness, twitching, and inappetance. Ex. 4 (Flash Import Permit); Ex. 5 (Flash Necropsy).

SeaQuest’s exotic animal permit allows it to possess, among other individuals, the male sloth who died on April 8. Ex. 6. Because exotic animal permits only authorize individually identified animals, SeaQuest needs explicit approval from the CCAC before it can legally possess and exhibit another sloth. *See* Clark Co. Code § 10.18.010(g). If SeaQuest seeks such approval, the CCAC is required to investigate and “ascertain what precautions” are necessary to protect the health, safety, and general welfare of the animal. *Id.* § 10.18.010(d). The CCAC can consider “the criteria or standards of recognized societies, groups or experts dealing with such animal species, and any citizen input” when deciding whether to grant authorization for possession of an exotic animal. *Id.* § 10.18.010(f). In addition, the CCAC has broad discretion to revoke, suspend, or refuse to renew any exotic or wild animal permit for good cause. *Id.* § 10.18.040(b).

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.)

The back-to-back deaths of two sloths who experienced similar symptoms and who failed to survive for even a year in SeaQuest's care provides the CCAC amply good cause to deny any future requests from SeaQuest to possess and exhibit sloths. These two sloth deaths raise serious concerns about SeaQuest's ability to adequately care for this species. Dr. Bando opined:

Sloths in captivity are prone to numerous issues that are secondary to poor husbandry and diet. Twitching and weakness are concerning clinical signs and the primary potential causes to screen for include poor nutrition, metabolic derangements, and/or infection. Poor husbandry, inappropriate diet, unnatural environments, and human handling are all stressors, and chronic stress is a well-recognized cause of immune suppression. Therefore any or all of these factors likely contributed to a very compromised immune system for these individuals who would have struggled to cope with any sort of infection. Due to sloths' slow metabolism, they may experience profound underlying metabolic deficits and illness before exhibiting overt clinical signs. Facilities that lack appropriate expertise of the species and fail to perform routine physical examinations are less likely to identify husbandry deficits or abnormal behaviors, which can cause unnecessary and prolonged suffering. Furthermore, there are significant knowledge gaps in the scientific literature about sloth biology and medicine. It is therefore even more imperative that any facilities housing these animals have legitimate expertise in zoo and wildlife medicine and welfare to have any hope of providing the highest standards of sloth husbandry based on current best practice standards to meet their complex physical, physiological, behavioral, and cognitive needs.

According to Dr. Bando, after the first sloth's death, SeaQuest should have performed a thorough review of everything, including where these animals were sourced, transportation parameters, quarantine measures, infectious disease screening, preventative medicine measures, and husbandry practices such as, temperature, humidity parameters, sources of stress, and nutrition. Instead, on August 21, 2020—less than a month after Flash died and about a week after his death was reported to CCAC and a necropsy ordered—SeaQuest obtained a permit from the Nevada Department of Wildlife to import another sloth. Ex. 7 (Import Permit). The permit was ultimately cancelled, and on September 30, 2020, the CCAC placed “a hold on any new sloths being brought to the facility while [CCAC] reviewed the deceased sloth's necropsy and vet reports.” Ex. 3. From these records, it does not appear that SeaQuest did any due diligence on its own to determine if conditions or husbandry practices at its facility contributed to Flash's death. Rather, the records suggest their prime concern was quickly acquiring another sloth, who ultimately died under similar circumstances.

SeaQuest Las Vegas has previously shown its complete inability to meet the specialized needs of the wild animals in its care. In 2018, two otters died within a three month period, one of whom drowned after her arm got caught in a pool filtration system. Ex. 8 (Otter Necropsies). The “replacement otter”—Hazelnut—became pregnant after SeaQuest carelessly housed her with a male otter even though its permit prohibits breeding. SeaQuest failed to notice she was pregnant until 1 week before she gave birth, prompting a hearing officer to question “the knowledge and experience” of SeaQuest's staff. Ex. 9 (Administrative Citation Appeal). Now, SeaQuest has had two sloths die within a nine month period, again raising questions about the knowledge and experience of its staff.

The CCAC has the authority to stop SeaQuest from possessing sloths, which is the only way to ensure that no more sloths die prematurely at this facility. Please exercise your ample discretion to prevent SeaQuest from possessing sloths.

Thank you for your attention to this important matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Michelle Sinnott".

Michelle Sinnott, Esq.
Associate Director, Captive Animal Law Enforcement