

October 20, 2021

Robert Gibbens, DVM
 Director, Animal Welfare Operations
 USDA/APHIS/Animal Care

Via email: animalcare@usda.gov

Re: Request to Investigate Apparent Animal Welfare Act Violations at
 SeaQuest Las Vegas (License No. 88-C-0216, Site 001)

Dear Dr. Gibbens,

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate SeaQuest Holdings, LLC (“SeaQuest,” license no. 88-C-0216, Site 001) for apparent violations of the Animal Welfare Act (AWA) after a sloth died—the second sloth to die at this facility.

According to recently obtained public records from the Clark County Animal Control, a two-year-old sloth died at SeaQuest’s Las Vegas location on April 8, 2021. Ex. 1 (Necropsy). This sloth was shipped from SeaQuest’s Fort Worth, 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 the Las Vegas facility—Flash—was acquired from an exotic animal breeder in Florida (World Exotics, license no. 58-B-0282) in November 2019, and died seven months later after exhibiting weakness, twitching, and inappetance. Ex. 4 (Flash Import Permit); Ex. 5 (Flash Necropsy); *see also* USDA complaint no. AC21-159.

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 is concerning. 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

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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 a necropsy was ordered—SeaQuest obtained a permit from the Nevada Department of Wildlife to import another sloth. Ex. 6 (Import Permit). The permit was ultimately cancelled, and on September 30, 2020, Clark County Animal Control placed “a hold on any new sloths being brought to the facility while [Animal Control] reviewed the deceased sloth's necropsy and vet reports.” Ex. 3. Based on 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's troubling history with sloths is not limited to the Las Vegas location. The following incidents at other SeaQuest facilities further demonstrate this company's apparent lack of appropriate expertise and knowledge of this species:

- SeaQuest Colorado (Site 005) – In 2018, a sloth was severely burned by a heat lamp in his enclosure on two separate occasions. SeaQuest only reconfigured his enclosure to prevent access to the lamp's bulb after the second injury led to a warning from Jefferson County Animal Control and a citation from Colorado Parks and Wildlife. Ex. 7 (License Suspension Decision); Ex. 8 (Warning).
- SeaQuest New Jersey (Site 011) – In 2020, reports surfaced alleging that the sloth at this location died and was surreptitiously replaced with another. Ex. 9.
- SeaQuest Texas (Site 003) – In 2021, the USDA cited SeaQuest for maintaining a sloth in an inappropriate enclosure “with sheetrock walls that ha[d] peeling rubber trim” explaining that “[s]heetrock is not an appropriate material for animal enclosures.” Ex. 10.

Please fully investigate the circumstances that led to this latest sloth death as it appears that SeaQuest may have violated the AWA regulations, including 9 C.F.R § 2.131(a), which requires that “[a]ll licensees who maintain wild or exotic animals must demonstrate adequate experience and knowledge of the species they maintain.” Please also hold SeaQuest fully accountable for any and all violations that you discover during your inspection.

Thank you for your attention to this important matter. Please inform me of the complaint number that your agency assigns to this correspondence.

Very truly yours,

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

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