

November 19, 2021

USDA/APHIS/Animal Care

Via e-mail: animalcare@usda.gov

Re: Request for Investigation of Apparent Animal Welfare Act Violations at
 Barry Kirshner Wildlife Foundation (License No. 93-C-0504)

Dear Animal Care,

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) immediately investigate Roberta A. Kirshner, dba the “Barry R. Kirshner Wildlife Foundation” (“Kirshner,” license number 93-C-0504), for apparent Animal Welfare Act (AWA) violations involving improper handling of a juvenile snow leopard.

On November 3, Kirshner volunteer Angela Bracco brought a juvenile snow leopard to what appears to be a juvenile detention facility and allowed members of the public to handle him or her. Photos and a video of staff and others holding the cub were [posted to Facebook](#) (see Exhibit 1 and [Video 1](#)). Another Kirshner volunteer previously [posted](#) photos of himself on Facebook with this cub on October 30, claiming that the cub was 10 weeks old at the time. (See Exhibit 2.) In fact, this cub appears to be at least 4 months old, exceeding the 12-16-week age window the USDA considers acceptable for public handling of big cats.¹ At this age, a snow leopard is capable of injuring humans with its large paws, long claws, and sharp canine teeth. This activity is in apparent violation of 9 C.F.R. §2.131(c)(1) which states that “[d]uring public exhibition, any animal must be handled so there is minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public so as to assure the safety of animals and the public.”

Furthermore, wild snow leopards remain with their mothers for two years, and photo ops are not a legitimate reason to remove them from her care early. Removing cubs from their mothers prematurely and subjecting them to the stresses and excessive handling inherent in public encounters apparently violates 9 C.F.R. § 2.131(b)(1) which states “[h]andling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort,” and 9 C.F.R. § 2.131(c)(3), which requires 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.” Further, it appears that, by permitting a volunteer to transport this leopard to a juvenile detention facility, Kirshner is failing to exhibit the cub “only for periods of time and under conditions consistent with [the cub’s] good health and well-being,” as required by 9 C.F.R. § 2.131(d)(1).

¹ See [USDA APHIS 2020 Animal Welfare Inspection Guide](#), section 4.17.1.2. (Public Contact) which states “At approximately 12 – 16 weeks of age dangerous animals, such as, tigers, lions, bears, and wolves, become too big, too fast and too strong to be used for public contact.”

PEOPLE FOR
 THE ETHICAL
 TREATMENT
 OF ANIMALS
 FOUNDATION

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

PETA FOUNDATION IS AN
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 TO SUPPORT ANIMAL PROTECTION.

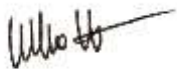
AFFILIATES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

Please inspect Kirshner and ensure that all animals are being handled in accordance with the AWA. Please also hold Roberta Kirshner and any and all responsible parties accountable to the fullest extent of the law for any violations that your investigation reveals.

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,



Willow Hecht, M.Sc.
Captive Wildlife Specialist
Captive Animal Law Enforcement
[REDACTED]

cc: Dr. Laurie Gage, Big Cat and Marine Mammal Specialist
(laurie.j.gage@aphis.usda.gov)