factsheet

Craig Kokas

3153 Prospect–Upper Sandusky Rd., Prospect, OH 43342

> Craig Kokas, a breeder and dealer doing business as Kokas Exotics, has failed to meet minimum standards for the care of animals as established by the federal Animal Welfare Act (AWA). The U.S. Department of Agriculture (USDA) has cited him for, among other things, failing to have an attending veterinarian, failing to provide animals with adequate veterinary care, failing to provide them with adequate shelter, failing to provide water, failing to maintain enclosures in good repair, failing to provide sanitary enclosures, failing to provide an adequate diet, failing to clean water and food receptacles properly, failing to have a perimeter fence, failing to maintain animal records, failing to have a suitable method to eliminate excess water rapidly, and failing to have an adequate number of employees. In 2011, a kangaroo attacked a member of Kokas' family, who required hospitalization. In September 2022, the USDA suspended Kokas' license for 21 days for more than 20 alleged violations of the AWA. In February 2023, the USDA filed a complaint against Kokas alleging more than 110 willful violations of the AWA over a 14-month period. Please contact PETA for documentation.

June 2, 2023: The USDA issued Kokas a repeat citation for failing to provide a fallow deer with adequate veterinary care. The attending veterinarian diagnosed the deer with intestinal worms on May 31, 2023, and recommended treating all 11 fallow deer with medication. During this inspection, the licensee stated that he hadn't realized that

the deer had been diagnosed with intestinal parasites and that he hadn't treated them. Kokas was issued repeat citations for failing to maintain complete and accurate records of acquisition and for failing to maintain multiple animal enclosures in good repair. A red fox enclosure had broken wire in the flooring, leaving sharp points that could injure the animals, and a nest box in a skunk enclosure had an area of deteriorated, rotted wood, Additionally, the wooden frame supporting this enclosure and several other skunk enclosures was deteriorated and no longer structurally sound. Kokas was also issued a direct citation for failing to take appropriate measures to alleviate the impact of extreme heat on five minks, who were found to be excessively hot during the inspection. The minks appeared to be lethargic, were stretched out on their backs with their bellies up, and were observed panting. Their behavior indicated that they had been adversely affected by the temperature, which was approximately 90 degrees during the inspection.

May 18, 2023: The USDA issued Kokas a critical repeat citation for failing to provide adequate veterinary care for multiple animals, including the following:

A groundhog had sustained a severe injury to the right eye. The globe of the eye wasn't visible and appeared sunken completely into the socket, which was open and had soft tissue exposed. A large amount of fur was missing around the eye, and the surrounding skin was discolored and appeared to be scar tissue. The apparent scarring covered several inches, extending from the animal's ear past the eye, with scabs and flaky skin extending toward the nose. The licensee stated that the injury was traumatic but hadn't been treated by a veterinarian.

- A fox had extreme hair loss on the tail from the base to the tip, with red areas that could indicate chewing.
- Two bobcats were housed in an enclosure with dark, watery stools present, including five puddles of black and/or green liquid excreta.
- Two red foxes were in an enclosure with watery yellow stools present.
- A female arctic fox and her litter of pups had significant amounts of diarrhea under their enclosure.

The veterinary care program requires that the facility conduct fecal testing on 10% of the animals housed there every year. But the licensee stated that he hadn't done any fecal testing in the past year, even though multiple animals had experienced diarrhea and loose stools.

Kokas was issued a repeat citation for failing to have complete and accurate records of the animals on hand. He didn't maintain acquisition records for any of the animals born at the property and had incomplete and missing disposition records, including no such records for some hedgehogs, skunks, groundhogs, and raccoons.

Kokas was issued a direct repeat citation for failing to maintain 13 animal enclosures in good repair, including the following:

 An enclosure for three raccoons had multiple areas of deterioration and was no longer structurally sound. Several wooden support posts had eroded more than 90%, leaving the enclosure supported by only the nails of the posts and wire. The bottom corners of the door frame had deteriorated enough to cause significant instability in the door, making it structurally unsound, and a large area of the metal roof had rusted through, leaving a hole with jagged edges and sharp points.

- Three skunk enclosures had significantly deteriorated and unstable wooden frames, with nest boxes that had deteriorated and rotted wood that left them structurally unsound.
- Nine enclosures housing eight red foxes, four gray foxes, four groundhogs, and two minks had broken wire in the flooring and sides, leaving sharp edges that could injure or entrap the animals. In several of the enclosures, the sharp wire points were near the access hole to the nest box or near the feeders.

Kokas was issued repeat citations for failing to have primary enclosures a sufficient distance from the perimeter fence in order to prevent physical contact between animals in the facility and humans or other animals outside the fence: failing to remove excessive accumulation of excreta from several enclosures, including a red fox nest box that was wet and contained excessive feces that left the pups slightly wet with what appeared to be urine and feces; and failing to adequately clean the premises, which had excessively tall weeds and grass and a large number of cobwebs around the enclosures. Kokas was also cited for failing to have an adequate "pest" control program to manage flies. Multiple primary encloses had large swarms of flies congregating on accumulated excreta.

April 27, 2023: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany officials during an inspection.

April 20, 2023: The USDA cited Kokas for transporting two red foxes to the Mid-Ohio Alternative Animal and Bird Sale in an enclosure that didn't have openings or doors to allow removal of the animals during an emergency. The only way to remove the foxes was to use a tool to cut into the wire or to cut the clamps off. Kokas was also cited for failing to mark the transport enclosure with the words "Live Animal" or "Wild Animal" or arrows indicating the correct upright position of the cage.

March 20, 2023: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany officials during an inspection.

February 2, 2023: The USDA filed an AWA complaint against Kokas alleging over 110 willful violations of the AWA between September 2021 and November 2022, including repeatedly failing to adequately assess the health and well-being of animals, which left dozens of them in need of veterinary evaluation and treatment; performing descenting surgery on skunks without veterinary oversight or postprocedural care or pain control; keeping animals in enclosures that weren't structurally sound or large enough to allow them adequate freedom of movement; failing to provide hundreds of animals with adequate shelter from inclement weather; and repeatedly failing to provide animals with clean drinking water, appropriate diets, and clean feeding receptacles. The complaint also stated that on September 23, 2022, the USDA had confiscated two "minimally responsive" animals from Kokas: a Bennett's wallaby and a striped skunk. The day before (see the entry for September 22, 2022), inspectors found that the wallaby was unable to lift his head, was cold to the touch, and breathed with a rough, wet sound and that the skunk was slow and sluggish and had swelling in her mouth as well as saliva covering her face and chest, which could indicate a possible disease or oral wounds.

December 13, 2022: The USDA issued Kokas a repeat citation for failing to have an appropriate perimeter fence to keep outside animals and unauthorized humans from accessing animals at the facility.

November 15, 2022: The USDA issued Kokas a critical repeat citation for failing to maintain the sika deer enclosure, which continued to have large sections of loose fencing, in good repair. One section of the fence had been removed and replaced, but there were still large areas that hadn't been maintained properly. At least two remaining support posts were in poor repair, large sections of fencing were poorly secured, and approximately 10 support posts were no longer fully attached, which allowed the fence to move and sway easily when touched. In several areas, the bottom of the fence continued to be poorly secured to the ground, which could allow animals to push under it. The majority of the fence was still loose, and sharp points remained at the bottom. Due to these problems, animals could easily become entrapped and there was a significant risk of animals escaping and of predators such as dogs entering the enclosure. The inspector noted that the fawn who had escaped on November 5, 2022, had been recaptured by the time of this inspection.

The USDA issued another critical repeat citation for failing to have a perimeter fence to keep animals and unauthorized humans from accessing animals at the facility. Due to maintenance issues with the sika deer enclosure, it wasn't effective and had failed to contain animals, allowing two to escape. On at least two prior occasions, sika deer and arctic foxes had escaped from the facility because of the lack of a perimeter fence or secondary containment. No alternative security measures were in place to contain the animals.

November 8, 2022: The USDA issued Kokas a direct repeat citation for failing to maintain the sika deer enclosure in good repair. There were large sections of loose fencing and areas where the fence was crumpled. In addition, the rear area of the

enclosure had a broken post and the top portion was dangling into the enclosure. The licensee stated to inspectors that on November 5, 2022, two dogs had entered the property, causing two fawns to become separated from their herd and to escape from the primary enclosure. One of the fawns was recovered by the licensee, but the other hadn't been found at the time of this inspection. The USDA also issued a critical repeat citation for failing to have a perimeter fence to keep other animals and unauthorized humans from accessing animals at the facility. The USDA issued Kokas repeat citations for failing to have a record of animals on hand or complete records of animal disposition and for failing to keep premises clean in order to protect the health of the animals. The property had accumulations of trash and junk collected in piles around the animal enclosures. including within the center aisle of the mink and ferret barn. These accumulations could house "pests and vermin" that could expose the animals to disease hazards.

October 13, 2022: The USDA issued Kokas a critical repeat citation for failing to conduct daily observations of the animals and failing to report health problems to the attending veterinarian. During the inspection, seven animals were identified who required veterinary care:

- A male alpaca had a mass at the base of his ear with cream-colored discharge coming out. When pressure was applied to the mass, a large amount of thick discharge was expressed. Leaving this abscess untreated could lead to unnecessary pain and suffering.
- An arctic fox and five skunks had excessively long nails that extended through the wire floors of their enclosures. Excessively long nails could cause difficulty walking and could become caught in the wire enclosure, causing injury.

Kokas was issued a direct repeat citation for failing to provide animals with adequate drinking water. Approximately 30% of the animals were found to be thirsty and had dry water containers, and several animals had water contaminated with feces. Approximately 184 animals drank immediately when provided with water during the inspection. Several animals were observed drinking voraciously, including at least three foxes who drank for over two minutes and two minks who both drank water to the point of spitting up, only to continue drinking again immediately afterward.

October 4, 2022: The USDA issued Kokas a direct repeat citation for failing to have an attending veterinarian present. In addition, a direct repeat citation was issued for failing to provide 11 animals with adequate veterinary care:

- Two singly housed minks were wounded at the base of their tails. One had an injury that covered the majority of the tail base with crusted hair matted into the wound. The second mink had a wound in a similar location that was larger, had dark red scabs of various sizes, and was seeping a clear reddish-yellow discharge. The licensee stated that he had seen these minks' injuries a few days prior but that he had not provided the animals with any care or sought a veterinarian to examine them.
- Five alpacas, all housed in one enclosure, had matted hair, excess fiber, and poor body conditions. A female's spine was readily apparent even from a distance. Individual vertebral bodies could be identified on her back, indicating that she was markedly underweight. She was also nursing a cria, which placed an additional strain on her metabolism. Two adult alpacas had excessive fiber, so

inspectors weren't able to assess their body condition visually. The adult male alpaca had been shorn more recently and was clearly excessively thin, as there was no fat visible on him. His pelvis, vertebrae, ribs, and shoulders were all readily apparent. Additionally, his nose and mouth appeared to deviate to the right, off the midline. This type of facial deviation could indicate dental problems, which can make eating difficult for the affected animal. None of these conditions had been assessed by a veterinarian.

- An unweaned female raccoon was missing her left rear foot from the hock down. The distal end of the stub was covered with hairless pink skin. Two ulcerated areas were present on two sides of the stub. As she was observed moving around, the stub began to bleed. The licensee stated that he was aware that she was missing a foot but that he had not sought veterinary care for her to treat this injury or ensured that appropriate housing was provided (such as a solid floor to prevent the stub from going through the wire mesh, which would prevent further injury). The raccoon and her mother continued to be housed in a wire-bottom enclosure that had several sharp points in front of the nest box.
- A singly housed arctic fox in an enclosure without shelter remained excessively thin, with hips, pelvis, and ribs more readily apparent than they should have been, especially with the amount of winter fur present. The licensee stated that he hadn't sought veterinary care for this animal and that he had thought the fox was just old.
- One striped skunk and one arctic fox had extremely long nails, which were pointing in abnormal directions, and both animals had been called to the licensee's attention on the prior inspection report. In addition, other

animals (an arctic fox, a red fox, and a less severely affected skunk) had overgrown toenails that required trimming to ensure optimal health, safety, and comfort.

The USDA also issued a direct repeat citation for failing to offer adequate veterinary care to the following 11 animals, who had issues that the licensee hadn't noticed prior to the inspection:

- A light blue–gray mink had an open wound, approximately 1 inch in diameter, on the upper chest and lower neck. Bright red tissue was visible in the center of the wound. Yellow, dried discharge was caked around the wound and dangling from the surrounding fur.
- A black mink had an open 1-inch-by-2inch neck wound that was crusted with scabs and discharge. The hair in the affected area was wet and matted, trapping debris inside the wound.
- A blue-gray mink had an open wound on the tip of the tail that was bright pink with dark red crusts and scabs around the edge. There was hair loss around the wound, and bedding and other debris was dried to the wounded tip of the tail.
- A gray mink had injuries to the nose and on both rear legs. A line of blood or ulcerated tissue was on the dorsal surface of the nose, where it met the hairy surface of the animal's face. The mink's feet were swollen, with a red discharge that appeared to be dried blood on both hind feet, extending to the abdomen and tail, with red crusty material dried on those areas. Similar discharge had accumulated on the wire floor of the enclosure. The licensee had removed the animal from the enclosure for further inspection. After the mink was placed back into the enclosure, the animal was observed to be having difficulty with their back legs. The mink

appeared to be lame and would fall from side to side, with their hips touching the wire floor as they tried to enter a hide box. In the enclosure housing this animal, the food and water present at the time of inspection could only be accessed by standing on thin, bare, uncoated wire, which could easily exacerbate foot wounds. The only solid flooring was within the nest box.

- A light-colored mink had a horseshoeshaped wound at the base of the tail. This wound was pink and open and oozed a yellow-red-tinged fluid. The discharge crusted the surrounding fur, and a wood chip was crusted and stuck to the edge of the wound.
- A striped skunk was holding their mouth partially open. Upon further inspection, the animal's top and bottom gums were found to be swollen. The skunk was missing multiple teeth, and those that were visible appeared brown and caked with hard mineral deposits, which obscured the view of the teeth themselves. The skunk continued to hold their mouth partially open throughout the entire time they were being examined, as though they were either unwilling or unable to close it all the way. Additionally, this animal had extremely long overgrown nails that could easily have become trapped in the wire floor.
- One skunk had bilateral eye discoloration. Both eyes appeared dry with a slightly irregular surface. The surface of the eyes was a cloudy, milky white with a dried crusty discharge. The discharge was worse in the right eye. This skunk also had a brown-red crusty nasal discharge adhered to both nostrils.
- Another adult striped skunk also had bilateral eye discoloration. The surface of both eyes appeared cloudy with dark irregular streaks. A small amount of ocular discharge had accumulated in the

corner of the right eye, near the animal's nose. This skunk also had a distinct linear area of hair loss on the bridge of the nose that extended into the animal's white hair. The underlying skin was normal, giving the appearance of a scar.

- A striped skunk had a sunken right eye, with mild swelling present on the animal's cheek. Sunken eyes in skunks can indicate dehydration, disease, or injury.
- A white-colored red fox had discharge weeping from the right eye, although the eye appeared clear and normal. An accumulation of crusty red-brown debris extended from the inside corner of the eye to the nose.
- An arctic fox had eye discharge accumulated at the inside corners of both eyes, although the eyes appeared clear and normal. An accumulation of wet brown debris extended from the inside corners of the eyes toward the nose.

Another direct repeat citation was issued to Kokas for failing to provide animals with water:

The majority of the animals were • excessively thirsty because their water containers were dry. When offered water, most of them drank continuously in excess of three to five minutes. Most of the water receptacles for the three fox species, the striped skunk, the coatimundis, the groundhog, the minks, and the ferrets were empty and dry. The licensee provided these animals with water throughout the inspection, and the majority of them drank for excessively long periods, indicating that water was still not being provided as often as is necessary for their health and comfort. Many of the foxes and raccoons pawed at their empty water receptacles, and as the licensee approached enclosures while watering them, "frequently the fox or raccoon in the next few enclosures

were seen frantically digging at their dry water receptacles and those further away were heard vocalizing anxiously. When the licensee finally added water to their enclosures, in each case, the animals ceased those behaviors and immediately began drinking. As animals were watered, those housed in groups were often pushing one another away, competing to access the water. In one case, two co-housed red fox[es] were observed snarling, snapping, and lunging at one another, fighting over the water. The larger male fox drank for approximately 2.5 minutes while intermittently guarding the water, preventing the female from accessing it. When the female fox was finally able to drink, she drank for another two minutes emptying the water container. The licensee was asked to provide additional water, and again, the female fox drank for a prolonged time (not less than another full minute)."

Inspectors estimated that at least 80% to 90% of the listed species were observed drinking water excessively when it was offered. The two coatimundis were observed drinking for more than a full minute. Numerous foxes, skunks, and raccoons drank continuously for nearly two minutes. Several foxes and skunks drank for more than three minutes and some for more than five minutes. One groundhog was seen drinking nearly continuously for more than four minutes, despite significant nearby disturbances.

Kokas was issued a repeat citation for failing to have a record of animals on hand and complete records of animal acquisition and disposition. A direct repeat citation was issued for failing to maintain animal housing in good repair for the animals' safety:

• Groundhogs continued to be housed in two enclosures that remained

excessively rusty to the point that the structural supports were breaking. Areas of the wire that made up the enclosure's floor had rusted all the way through, leaving holes that were 4 inches by 4 inches or larger, with sharp points that could injure the animals. Additionally, the sides of the enclosure had rusted so severely that the metal supports were nearly gone in some areas, creating numerous sharp edges that could injure the animals.

- An enclosure that had previously been noted to have excessively rusted wire flooring was still being used to house a red fox. The enclosure had a linear section of wire flooring on which each wire had been cut or broken and that resulted in a split in the wire that was approximately 2 feet long. This damage caused a large portion of the floor to be unsupported and to flex when the fox walked near it, creating a larger opening with sharp points that protruded into the enclosure. Additionally, other areas of broken wires protruded up into the enclosure in front of the feeder, where the fox had to stand to eat. The feeder itself was rusty and had corroded, creating more sharp points and edges. Sharp points coming up from the floor posed a risk of injury, and the large opening created by the split floor could have led to an escape.
- The sika deer enclosure continued to have large gaps along the bottom, with broken and tangled wire. Large sections of the fence continued to be loose, and the post in the back of the enclosure remained broken, with the top portion dangling into the enclosure. Many areas of the fence were crumpled, some with evident repair attempts, but they remained loose, posing a risk of injury to the deer and potentially allowing other animals, such as coyotes or dogs, to enter the enclosure.

- An enclosure that contained a female raccoon and her three-legged offspring had broken wires with exposed sharp points in the flooring. The juvenile raccoon, not yet separated from her mother, began bleeding after she was returned to the enclosure following examination. The inspection report noted that "[t]he broken wire on the floor probably contributes to the ongoing injury of the damaged limb."
- A raised wire enclosure that contained a pair of red foxes had an excessively rusted floor. A 4-inch section of broken wire had completely rusted through, creating sharp points.
- A raised wire enclosure that contained a pair of red foxes had rusted excessively. Multiple areas on the wire floor had completely rusted through, creating breaks and sharp edges. One of these areas was a 4-inch-by-2-inch hole with multiple sharp points, large enough for a foot, leg, or other body part to become entrapped.
- An enclosure that contained a pair of raccoons had cuts or breaks in the wire floor that created multiple sharp points. The floor of the enclosure had two layers of wire from previous repairs. An approximately 15-inch break in the wire left sharp points, especially when the weight of the animals flexed the floor and enlarged the opening, creating a risk that an animal's feet or legs could become caught in the wire.
- Approximately 50% to 60% of the mink and ferret enclosures had sharp points surrounding the opening between the nest box and the wire portion of their enclosures. A nest box that hung outside the enclosure had a round hole in it that allowed animals to access the wire portion of the enclosure. A corresponding hole had been cut into the wire. However, the wires had been cut, leaving long, sharp points, some of which protruded into the circular

opening of the nest box. As a result, the minks and ferrets were exposed to these sharp points every time they entered or left the nest box.

 Sharp points remained on multiple fox, skunk, mink, and ferret enclosures. Many areas of the wire floors had broken wires protruding into the enclosures. Numerous enclosures continued to have sharp points resulting from broken wires, holes, rusted feeders, etc. In many enclosures, the areas with broken wires and sharp points were frequented by the animals, such as around shelter boxes, feeders, and water receptacles.

The USDA issued Kokas a direct repeat citation for failing to provide 94 animals with adequate shelter. The enclosures were constructed of approximately 1-inch-square wire mesh with an ill-fitting (i.e., too small) piece of tin siding or wood placed on top. They were arranged in rows, with four to eight enclosures per row. The individual enclosures had either no side walls or a small piece of solid blue partition or perforated white plastic affixed to one wall, which the licensee said was supposed to function as a windbreak. Twenty-four singly housed arctic foxes and 32 red foxes (in 20 enclosures) had a piece of blue plastic board material attached to the wire mesh between enclosures that shared a common wall, which provided a partial partition. Thirty red foxes (in 17 enclosures) had a perforated piece of white plastic board material that provided this partial partition. Eight singly housed arctic foxes had no partitions other than the wire mesh. Nighttime temperatures locally had been in the 30s and 40s, and there had been significant winds recently. Multiple large tree limbs had fallen onto enclosures due to the intense gusts of wind, and these animals didn't have adequate protection from inclement weather, nor did they have visual barriers to avoid perceived threats, such as

other foxes housed in close proximity. Numerous arctic foxes were frozen in position, growling, and/or attempting to climb the walls of the enclosure to escape as inspectors approached. This demonstrated their instinctual need to hide in the face of perceived danger. The inspection report noted, "The animals suffer psychological and physical harm under these conditions."

Kokas received a repeat citation for failing to provide animals with appropriate, wholesome, palatable food, free from contamination and of sufficient quantity and nutritive value to maintain good health:

- Several ferrets, foxes, minks, raccoons, and skunks continued to have loose stools—ranging from soft to watery which accumulated beneath their enclosures.
- One arctic fox and a white-colored red fox remained underweight. In each case the hips, ribs, vertebrae, and pelvis were all visible despite a heavy fur coat.
- At least half of the alpacas remained underweight, while the body condition of the others couldn't be assessed, given that they were too heavily matted.

Kokas received repeat citations for failing to have a suitable method to rapidly eliminate excess water; failing to have a perimeter fence to keep animals and unauthorized persons from accessing animals at the facility; failing to properly sanitize food receptacles, causing old food, dirt, and grime to collect in food containers; and failing to clean enclosures:

 Large accumulations of feces and fecal piles remained under some of the red fox, arctic fox, raccoon, mink, and skunk enclosures, and several fox, skunk, and raccoon enclosures had accumulations approximately a foot in diameter and as high as 4 to 6 inches. The hide boxes that had solid bottoms frequently contained large accumulations of feces. In several instances, the floor of the hide box was almost completely covered with dried feces.

- Approximately 95% of the mink, ferret, and skunk enclosures located in the mink barn had excessively large accumulations of feces, some of which were 4 to 6 inches high. Several of the enclosures also had significant accumulations of soft stool. Some enclosures had accumulated piles of feces that were several inches both high and across. Nearly all enclosures had feces, urine, hair, and debris running along the support beams as well as accumulations of soiled bedding between the nest box and the wire enclosure. A significant buildup of brown organic debris was apparent on nearly all surfaces of these enclosures.
- The groundhog enclosures that had hay or straw continued to be heavily contaminated with feces, causing the straw to form a solid mat in most areas.
- A strong odor lingered in the air, consistent with accumulations of urine and feces (particularly in the barn for minks and ferrets and near the enclosures that remained uncleaned). The inspection report noted, "Odors of this strength are irritating, and potentially damaging, to the sensitive lining of the respiratory system."

Another repeat citation was issued to Kokas for failing to maintain the premises to protect the health of the animals:

 Plants and grass in the rear fallow deer enclosure and around the wallaby enclosure continued to be so high (in many areas the weeds were greater than 2 feet tall) that the animals couldn't be readily observed. In two out of the three paddocks that housed the fallow deer, the fawns couldn't be easily seen. Accumulations of trash and junk, including empty cat food cans, wire fencing, and unused enclosures had collected in piles among and around the animal enclosures. Rodent holes were seen in several places on the property, including the barn for ferrets and minks. These accumulations provide "pests" with housing and protection, which could expose the regulated animals to disease hazards.

September 23, 2022: The USDA suspended Kokas' AWA license for 21 days. The official notice stated, "Our evidence reveals that, between November 26, 2019 and September 23, 2022, you failed to abide by licensing requirements, interfered with the inspection process, failed to provide an attending veterinarian who was able to provide adequate veterinary care, failed to give proper oversight authority to the attending veterinarian, failed to establish and maintain programs of adequate veterinary care, failed to conduct daily observation of the animals, failed to properly identify all live cats on the premises, failed to keep adequate records, failed to allow access to facility and records, failed to provide facilities for proper examination of records or inspection, failed to restrict outdoor housing for animals that may not acclimate properly, failed to provide proper outdoor housing, failed to provide adequate primary enclosures, failed to provide adequate shelter, failed to provide proper sanitation, failed to provide properly constructed facilities, failed to provide proper storage for food and/or bedding, failed to provide proper outdoor facilities, failed to provide adequate space in animal enclosures, failed to provide food and potable water, failed to maintain a sufficient number of adequately trained employees, failed to ensure proper separation of animals, and failed to have a contingency plan."

September 22, 2022: The USDA issued Kokas a direct repeat citation for failing to provide a wallaby with emergency veterinary care. During the inspection, inspectors noticed that the wallaby was in the outdoor portion of the enclosure, and it was clear that the animal wasn't responsive and exhibited shallow breathing. The wallaby was unable to lift their head, was cold to the touch, and breathed with a rough, wet sound. The licensee moved the wallaby to a warm room and wrapped the animal in blankets. The licensee called the attending veterinarian's clinic but was informed that it didn't know much about wallabies, didn't have experience treating them, and wasn't willing to treat this animal. The licensee attempted to call several other local veterinary clinics but was unable to find one willing to examine the animal or provide emergency veterinary care. Kokas was issued a direct citation for failing to have an attending vet clinic that could provide care in compliance with the AWA.

The USDA issued a direct repeat citation for failing to provide 15 animals with adequate veterinary care:

- A striped skunk was observed to have a large amount of saliva present on the face, extending from the left side of the mouth up to the left eye and ear, as well as under the chin and down the chest onto the front legs. Upon further inspection, the skunk appeared to have swelling in the mouth and appeared to be slow and slightly sluggish.
- A striped skunk was unable to open their left eye, which was completely sealed shut and swollen above the eyelid.
- An arctic fox kept in an enclosure without any shelter was excessively thin with visible hips, pelvis, and ribs.
- Four of the six alpacas continued to have an excessive amount of coat fiber present. Three had long, matted cords of fiber dangling from their body past

their knees, and the others had more tightly matted fiber. One alpaca was excessively thin with a prominent spine, and the body condition of the others couldn't be assessed because of the amount of fiber present.

- A raccoon housed alone continued to exhibit hair loss on the rump and the entire tail. The animal's hair was slightly longer than it had been during the previous inspection, but it still appeared short. The licensee continued to state that this animal was "molting." However, the hair appeared either chewed or torn off. The inspection report noted, "Hair with this type of extremely short appearance (not due to shearing / shaving) can occur for many reasons and may be self-inflicted such as selfbarbering due to severe psychological distress, breaking hairs from scratching, or hormonal causes."
- At least five adult striped skunks had extremely overgrown toenails. In each instance, the nails were long enough that they were curling over one another. In some cases, they were pushing the toes into abnormal positions.
- An adult male skunk with excessively long nails noted during the prior inspection continued to have an abnormal gait, even though his nails had been trimmed. The licensee removed this animal from the enclosure so that the inspectors could observe him more closely. A portion of his left hind foot had tan, flaky, crusty areas that appeared to be scabs and were likely contributing to his abnormal gait.
- One white-nosed coatimundi had hair loss on the tip of the tail. An approximately 2-inch area had extremely short hair, and an approximately 6-inch area had hair that was noticeably thinner than what appeared on the rest of the tail. The licensee stated that the coatimundi occasionally chews on the tail. When

self-induced, hair loss can indicate behavioral stress, neurological dysfunction, or other problems.

Kokas was issued a direct repeat citation for failing to maintain many enclosures in good repair:

- A raised wire enclosure containing a female red raccoon had fallen over and was being held upright by the adjacent enclosure. The wooden stilts on the back that held the wire enclosure off the ground had broken. The enclosure was at risk of falling and being damaged further, which could injure the raccoon or allow her to escape.
- A red fox enclosure had excessively rusty wire flooring and a section of flooring with cut or broken wire, resulting in a split in the wire that was approximately 2 feet long. This split left a large portion of the floor unsupported, which created an opening when the fox walked near it, and it had sharp points that protruded into the enclosure. The enclosure also had other areas of broken wires protruding up into it in front of the feeder, and the feeder itself had sharp edges resulting from rust.
- The sika deer enclosure continued to have large gaps along the bottom, with broken and tangled wire. One of the posts was loose, and a whole section of fencing was slanted on the rear of the enclosure. Another post was broken, and the top portion of the post hung down into the enclosure. Many areas of the fence were crumpled, posing a threat of injury to the deer, as well as allowing other animals to enter the enclosure.
- Two groundhog enclosures were excessively rusted, to the point that the structural supports were breaking. Areas of wire flooring in both enclosures had rusted all the way through, leaving holes that were 4 inches by 4 inches or larger

as well as sharp points that could injure the animals. The sides of the enclosures were also rusted so severely that the metal supports were nearly gone in some areas, and there were numerous sharp edges.

 Sharp points and broken wires protruded into multiple enclosures housing foxes, skunks, minks, and ferrets. In many of the enclosures, the broken wires and sharp points were in areas frequented by the animals, such as shelter boxes, feeders, and waterers.

Kokas was issued a direct repeat citation for failing to provide animals with a way to navigate their enclosure or engage in social adjustments like hiding:

- Thirty arctic foxes and 57 red foxes were housed in wire mesh enclosures up off the ground, with one or two animals per enclosure. There were no hide boxes for these animals to protect them from the elements and no visual barriers from anything around them.
- According to the licensee, many of the juvenile arctic foxes and red foxes had been moved to an enclosure with no box so that they wouldn't rub their fur off. These species normally live in dens, which provide protection from predators. The arctic foxes were adjacent to enclosures that housed red foxes or were within visual, auditory, and olfactory proximity of red foxes, who are natural predators to them. There were no barriers or places to hide from these stressors, so the animals had no way to reduce their stress levels.
- Most of the arctic foxes in the open enclosures displayed significant signs of stress, expressed in abnormal behavior for the species. They paced frantically, jumped back and forth and over cagemates, froze in a standing position while trying to get far away from the inspectors, stayed curled up in a tight

ball while growling continuously, or excessively pawed at water for extended periods.

 The red foxes in these open enclosures also showed signs of stress. Several of them jumped back and forth repeatedly in the enclosure, often leaping over a cagemate when no avoidance was possible.

Kokas was issued a direct repeat citation for failing to provide animals with an adequate amount of potable water and failing to keep water receptacles clean and sanitary:

- Approximately 10 fox enclosures had no water at the time of the inspection. The water in other enclosures was excessively dirty, and at least two other water receptacles contained feces.
- Two red foxes appeared excessively thirsty when water was provided and drank vigorously, stopping only when inspectors or the licensee moved. One of the foxes drank for approximately two and a half minutes, and the other fox drank for approximately one and a half minutes.
- At least two additional enclosures had feces in the water receptacles.
- Numerous other water receptacles had brown or tan debris or sediment mixed with the water, while others had water that appeared cloudy. The licensee stated that animals often defecate in their water receptacles.

Kokas was issued a direct citation for failing to ensure that animals housed together were compatible. A male and female red fox who were housed together were observed with wounds from fighting. The male fox had bloody saliva dripping from the left side of his mouth, matted blood on his face, and a swollen, bright red bottom lip. The female fox had matted blood on the left side of her neck from a recent fight. The enclosure had one hide box for both animals, and they were observed snarling and snapping at each other. The licensee stated that the pair had lived together previously, had been reintroduced approximately a week prior, and had been seen fighting.

Kokas was issued a repeat citation for failing to have a record of animals on hand or complete records of animal acquisitions and dispositions. The facility wasn't tracking the number of offspring born, and the licensee stated that he only records births through sales receipts once the animals have been separated from their mothers and sold. Records of animal deaths and euthanasia weren't recorded. The licensee stated that the white mink identified in the previous inspection had been euthanized, but there was no record of this.

Kokas was issued a repeat citation for failing to provide 30 arctic foxes and 57 red foxes with adequate shelter to protect them from blowing wind, rain, and snow, leaving them prone to exposure stress and disease hazards. The night prior to the inspection, the area had a significant storm with a large amount of rain and wind, and the overnight temperatures for the day of the inspection were expected to be 40 degrees.

Kokas was issued a repeat citation for failing to have an adequate method to drain excess water from the sika deer enclosure, which continued to have large areas of mud. Several deer had wet mud on their legs above their knees. Standing in the mud could compromise the integrity of the deer's feet, making the animals more prone to infection and abscesses. Kokas was also issued a repeat citation for failing to have a perimeter fence to keep outside animals and unauthorized humans from accessing animals at the facility.

Kokas was issued a repeat citation for failing to feed animals a diet with appropriate nutritive value to maintain good health. The majority of the foxes, skunks, raccoons, minks, and ferrets continued to exhibit signs of diarrhea and loose, watery stools that had mucus at times. The animals were fed a mixture of dog and cat food, and the licensee stated that the animals had loose stools because their diet was high in protein and fat. Kokas was issued a repeat citation for failing to ensure that food receptacles could be kept clean. The design of the food receptacles prevented adequate cleaning, and many of the feeders had significant accumulations of brown grime on the bottom. Kokas was issued a repeat citation for failing to remove feces from primary enclosures as often as necessary to prevent accumulations. Large accumulations of feces were present under many enclosures, and nearly all enclosures had feces, hair, urine, and debris running along the support beams. The groundhog enclosures were heavily contaminated with feces. This accumulation contributed to a strong ammonia and fecal odor around the area. Kokas was issued a repeat citation for failing to ensure that the grounds were kept clean and in good repair. Several areas of the property and multiple enclosures had an abundance of tall weeds and grasses that were as high as 2 feet tall. These weeds prevented animals from being seen from outside the enclosures, inhibiting opportunities to make adequate daily observations of them.

September 13, 2022: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany officials for an inspection.

August 31, 2022: The USDA issued a direct repeat citation for failing to provide animals with adequate veterinary care:

 An adult male bobcat had a very poor body condition, with readily visible vertebrae, ribs, and shoulders as well as a severe abdominal tuck. The licensee stated that the bobcat had been fed only every other day. The attending veterinarian had not examined the animal. The licensee had given the bobcat dewormer, but while the attending veterinarian had provided information regarding the dose, the licensee was unsure whether he was supposed to repeat the dose or provide it for multiple days.

The scent glands of 6- to 8-week-old skunks were being removed by the licensee without general anesthesia, and no guidance had been provided for post-procedural monitoring of these animals. The inspection report noted, "This is a major surgical procedure which produces permanent impairment of physical and physiological function, as defined by the Animal Welfare Act Regulations and Standards, with a high risk for complications such as rectal prolapse." The licensee stated that he had observed rectal prolapse in many of the adult skunks. He also stated that sometimes the prolapses had resolved on their own, whereas other times he had pushed them back in with his finger. The attending veterinarian had stated to a member of this inspection team that he is a mixed animal practitioner (dogs, cats, and farmed animals) and is not an exotic veterinarian. He had only seen the procedure performed by the licensee. The licensee had taught him how to perform the procedure, and he had not consulted with an experienced veterinarian about performing it. The inspection report noted, "The procedure as described by the attending veterinarian and being performed by the licensee is not adequate veterinary care and can lead to unnecessary pain and distress."

Another direct repeat citation was issued to Kokas for failing to provide 35 animals with adequate veterinary care:

- A white-colored red fox was identified as being in very poor body condition, with hips, pelvis, ribs, and shoulders easily visible. The fox had a poor fur coat and a pronounced abdominal tuck. No food or water was present in the animal's enclosure. When water was provided, both foxes in the enclosure drank. The severely underweight fox drank for a prolonged time (approximately 3 minutes), stopping only briefly when interrupted or when the animal went to look in the food bowl. The attending veterinarian had not been notified about the fox's body condition or increased thirst.
- An adult mink had patchy hair loss over the majority of their body. There were numerous scabs of varying sizes, and the underlying skin was red. The hair loss was worst around the base of the head and neck area. The licensee stated that he had not seen the hair loss.
- A skunk had severely overgrown toenails. They were thickened and so long that they were curling outward and twisting the toes into abnormal positions. This animal appeared slower than the others and reluctant to walk. When observed trying to groom their face, the animal appeared to have difficulty, stopped quickly, and appeared uncomfortable.
- An older female skunk had a white-andblue opaque discoloration, possibly a cataract, covering the entire corneal surface of the right eye and had a similar area on a portion of the surface of the left eye. The licensee had not noticed it before. There was no discharge, and the opacity was on the surface of the eye rather than within the eye itself (as usually occurs with cataracts).
- Five of the six alpacas had an excessive amount of fiber present. Two had long,

matted cords of fiber dangling from their bodies past their knees, and the others had more tightly matted fiber over their trunk and back. One alpaca was excessively thin with a very prominent spine, and the body condition of the others couldn't be assessed because of the amount of fiber present.

- A brown alpaca had lower incisor teeth so long that they protruded over the upper lip.
- A juvenile fallow deer had approximately 10 to 12 black, raised, circular, rough, wart-like growths, ranging in size from approximately half a centimeter to 2 centimeters, on both sides of the face, primarily around the eyes and mouth. When pointed out to the licensee, he stated that he had thought they were just flies.
- A raccoon housed alone had hair loss on the rump and the entire tail. The hair that was present was short, appearing nearly even with the skin. The licensee stated that this animal was "molting" and that "sometimes they do that." However, the hair appeared either chewed or torn off. The inspection report noted, "Hair with this type of extremely short appearance (not due to shearing / shaving) can occur for many reasons and may be self-inflicted such as selfbarbering due to severe psychological distress, breaking hairs from scratching, or hormonal causes."
- One gray-colored mink had hair loss on the tip of the tail, and an area approximately 1 centimeter long was nearly hairless. The licensee stated that he had not observed the hair loss in this animal but that sometimes minks pull or chew their fur out.

Kokas was issued a direct repeat citation for failing to provide animals with sufficient space to navigate their enclosure or engage in social adjustments like hiding:

- Thirty-six arctic foxes and four red foxes were housed in wire mesh enclosures off the ground, with two or three animals per enclosure and no hide boxes to protect them from the elements and no visual barriers from anything around them.
- According to the licensee, many of the juvenile arctic foxes had been moved to an enclosure with no box so that they wouldn't rub their fur off. The inspection report noted, "Normal postural and social adjustments for this species is to live in dens which provide cover and the ability to evade predators." These foxes were adjacent to enclosures that housed red foxes or were within visual, auditory, and olfactory proximity of red foxes, who are their natural predators. There were no barriers or places to hide from these stressors, so the animals had no way to reduce their stress levels.
- Most of the arctic foxes in the open enclosures displayed significant signs of stress, expressed as abnormal behavior for the species. They paced frantically, jumped back and forth and over cagemates, froze in a standing position, tried to get as far away as possible from the inspectors, stayed curled in a tight ball while growling continuously, or excessively pawed at water for extended periods.
- The red foxes in these open enclosures also showed signs of stress. One fox bit the wire mesh repeatedly, which could potentially injure the animal's mouth and teeth. Another red fox scratched at the base of the wire mesh repeatedly. Several other red foxes jumped back and forth repeatedly in the enclosure, often jumping over a cagemate when no avoidance was possible.

Another direct repeat citation was issued to Kokas for failing to provide animals with drinking water. Approximately 85% of the water receptacles were dry, and several

foxes and raccoon pawed at the empty water receptacle in their enclosure. At the request of the inspectors, the licensee provided water. At least 40 to 50 animals, including foxes, raccoons, skunks, and minks, drank continuously for prolonged periods. Several foxes, skunks, and raccoons drank for nearly two minutes continuously or paused briefly when startled by a human's presence, only to begin drinking again as soon as they felt comfortable to do so. Additionally, multiple water receptacles were still dirty with grime, debris, and/or a white flakey film that was not being cleaned out when fresh water was being offered.

The USDA issued Kokas a direct citation for failing to provide an appropriate diet of sufficient nutritive value and quantity for optimal animal health and welfare:

- A bobcat was extremely underweight. The vertebrae on the back were easily visible along with prominent hips and a concave tuck at the abdomen. The licensee stated that he had fed this animal every other day just one thawed muskrat (wild-caught in origin and then frozen) and four pieces of chicken of various sizes. The inspection report noted that "feeding wild-caught prey without conducting regular parasite testing, presents a risk to the health of the Bobcat. All animals must be fed once a day unless otherwise dictated by hibernation, veterinary treatment, normal fasts or other professionally accepted practices."
- The majority of the foxes, skunks, raccoons, minks, and ferrets exhibited signs of diarrhea or loose stool underneath the enclosures. Stool appeared watery or with mucus. The licensee was feeding a mixture of dog and cat food as the base diet to these species.

Kokas was cited for failing to have a contingency plan in case of emergency; for failing to have a suitable method to rapidly eliminate water in the sika deer enclosure, which had mud bogs from recent rain; and for conducting activities not authorized by a Class A (breeder) license. The licensee had used a groundhog annually for exhibit purposes on Groundhog's Day, which would require a Class B or Class C license.

Repeat citations were issued for failing to maintain complete records of animals on hand, acquisitions, and dispositions; for failing to have a perimeter fence around the outside housing facilities; for failing to remove old, moldy food from the food receptacles or properly sanitizing the feed containers; for failing to provide 36 arctic foxes and 4 red foxes with shelter from blowing wind, rain, and snow; and for failing to keep enclosures in good repair for the animals' safety.

- The wire mesh floor in one red fox enclosure had large holes in the wire. The largest hole was large enough for the fox to place their entire legs or head through, resulting in a significant risk of escape, and there were sharp points from broken wires around the entire hole. There were other areas of broken wires protruding up into the enclosure in front of the feeder where the animal needed to stand in order to eat and sharp, rusty edges on the feeder itself. The inspection report noted, "The licensee stated that he was aware these older enclosures in the back of the property were not in good condition, however, he just hasn't had time to move the fox to another enclosure."
- Sharp points remained on multiple fox, skunk, mink, and ferret enclosures, into which holes had been cut to accommodate feeders and access doors. At least 40% of the enclosures continued to have sharp points.

- The sika deer enclosure had large gaps along the bottom with broken and tangled wires. One of the posts was loose, and a whole section of fence slanted at the rear of the enclosure. One of the posts was broken, and the top portion dangled into the enclosure. Many areas of the fence were crumpled. Some repair attempts had been made, but sections remained loose, posing a threat of injury to the deer, as well as allowing access for other animals, such as coyotes or dogs.
- An opening in an enclosure wall was being aggressively chewed on by an arctic fox, which expanded the opening and created sharp edges that could cause injuries.
- A large tree limb had fallen on top of a few of the fox enclosures and crushed the tops down into the animals' space. The weight of the limb had compromised the structural integrity of the enclosure.

A critical citation was issued to Kokas for failing to make four raccoons available for inspection. These animals were previously identified as being housed in an inadequate enclosure, and when inspectors asked where the animals were, the licensee stated that they were at his daughter's residence so that she could bottle-rear them until they were ready for sale. The licensee claimed that he had no access when inspectors asked to go to that location to assess the animals, the primary enclosures, and the care they were receiving.

Lastly, Kokas was issued a repeat citation for failing to clean enclosures:

 Under the fox, raccoon, mink, and skunk enclosures, there was still a large accumulation of feces and fecal piles, some several inches high. The accumulation was contributing to a strong ammonia and fecal odor around the area.

- All around the edges of the bobcat enclosure, feces were on the ground. The licensee hosed the feces out of the primary enclosure but left them in the rocks directly adjacent to the enclosure.
- A big pile of feces was on the top of the nesting box in a large raccoon enclosure.

August 15, 2022: The USDA issued a direct citation to Kokas for failing to provide animals with adequate veterinary care:

- A skunk was displaying signs of pain, and his testes were red and swollen to the size of a golf ball. The licensee hadn't noticed that the animal was in need of a veterinary evaluation.
- Several of the arctic foxes had very long nails that needed to be trimmed.
- Multiple animals (raccoons, foxes, coatimundis, and skunks) were engaging in abnormal behavior patterns, including pacing, head-tossing, running up the sides of the wires, and flipping over inside enclosures. The inspection report noted, "Abnormal behavior patterns to this extent can be an indication of pain, psychological stress or poor welfare."

Kokas received a repeat citation for failing to provide adequate veterinary care to skunks. The licensee was still performing anal gland removal on skunks without proper oversight from the attending veterinarian, and the facility's written protocol was still missing the following:

- How to perform an anal sac removal (step by step, including the equipment to be used)
- Post-procedural care instructions
- Pain control measures

The USDA issued a direct citation to Kokas for failing to provide the following animals with sufficient space for postural adjustment and freedom of movement:

- Two fox kits were housed in an enclosure designed for a chinchilla. The kit couldn't stand on all fours, as his head was slightly down and his ears touched the top of the enclosure. The enclosure didn't provide enough space for the animal to stand up, turn around, or exercise freedom of movement appropriate for the species.
- Four raccoon kits being bottle-fed in the office area were housed in a small crate that didn't provide adequate space or freedom of movement.
- Multiple adult raccoons in wire enclosures were engaged in abnormal behavior patterns, pacing and circling in a repetitive pattern. One raccoon had hair loss on his tail, which could have been an indicator of stress. In addition, the licensee stated that any additional stress (like an additional person in the area) could cause the raccoons to kill their offspring. The inspection report noted, "Killing of offspring is also a strong indicator of space issues when the animal does not feel safe or have ability to avoid stress in this environment."
- A red fox was engaged in repetitive pacing behavior against the far wire mesh of his enclosure. The enclosure didn't have any complexity to allow the animal to make normal postural adjustments and social adjustments, such as digging or climbing, and didn't provide adequate freedom of movement for the species.
- The arctic foxes were housed in wire mesh enclosures off the ground, with two to three animals in an enclosure. There were no hide boxes or shelter for inclement weather in these enclosures. Several of the animals were pushing

themselves up the sides of the wire mesh enclosures and climbing over each other to get away from the inspector or freezing in place. The enclosures didn't provide enough space to allow for any postural or social adjustments for the foxes to have a place to hide or remove themselves from a stressful situation.

The inspection report notes, "A coati mundi was racing about his enclosure in a repetitive manner in a frantic motion while his cage mate stood in the entrance to the den box seemingly blocking his entrance to the den area." The enclosure didn't have a second den area for both animals, and the abnormal behavior pattern could have resulted from stress due to lack of space in this enclosure.

Repeat citations were issued to Kokas for failing to maintain records of animals born at the facility; failing to provide arctic foxes with shelter from inclement weather; failing to have a perimeter fence; failing to clean food receptacles (several of the foxes had old, moldy food in the base of their food container, and the metal feeder for three groundhogs had sharp, rusty edges); failing to clean water receptacles for the ferrets, skunks, and minks, which contained a layer of algae and grime; and failing to keep enclosures in good repair for the animals' safety:

- Multiple fox enclosures had several broken sections of the wire mesh flooring, creating gaps large enough for a foot to pass through, with sharp edges that could cause injury.
- A skunk enclosure had wire mesh that was broken, creating a gap with sharp edges that a foot could be caught in and injured.
- A section of fencing inside the sika deer enclosure was falling and bent. In addition, several sections of fencing

around the deer pen had large gaps (6 to 7 inches) at the base of the fence and ground that could allow animals to enter.

- Multiple enclosures for the foxes and groundhogs had a small section of wire mesh that had been cut near the food bowl. Several areas had wire protruding, and multiple animals were putting their noses through this hole, which could cause injury.
- An enclosure housing two groundhogs was rusted throughout its entirety. There were areas where the rust had affected the structural integrity of the door, creating sharp edges.

Kokas was also cited by the USDA for failing to clean an accumulation of feces from under the fox, raccoon, and coatimundi enclosures. Some of the feces had mold growth, and the accumulation contributed to the ammonia and fecal odor in the area. The spotted skunk enclosure had old, moldy feces in the corner of the nest box. The nest boxes were covered with hair and cobwebs, indicating that they weren't being checked with sufficient frequency to ensure the animals in the boxes didn't become soiled by their own waste. The facility was also cited for failing to remove "excess piles of old enclosures" and a pile of trash and debris, including 40-plus cat food cans left in between animal enclosures. In addition, several areas of the premises and enclosures for skunks, minks, and ferrets had excess hair, cobwebs, and debris throughout, trapping urine and leading to strong ammonia odors throughout the property.

Lastly, Kokas was cited for failing to have enough employees to maintain an acceptable level of husbandry and care for the animals at the facility, as evidenced by the number of noncompliant items. At the time, the licensee and two part-time employees were responsible for cleaning, feeding, watering, and observing more than 600 regulated animals.

March 23, 2022: The USDA issued Kokas a repeat citation for failing to give the attending veterinarian appropriate authority to ensure the provision of adequate veterinary care. The licensee stated that he would give different dewormers at different times of the year and would generally use the dosing instructions on the label. The labels for one bottle of Panacur and one bottle of Ivermectin contained dosage instructions only for horses, cattle, or swine. The written program of veterinary care didn't provide any specific schedule, screening, or indication for deworming, nor did it contain dosing or rotation instructions for the species maintained at the facility. The written program of care was also still missing information regarding surgical procedures (such as skunk anal sac removals) performed by facility personnel, including the following:

- How to perform the anal sac removal (step by step)
- Post-procedural care instructions
- Pain control measures

A critical repeat citation was issued to Kokas for failing to have a perimeter fence to restrict animals and unauthorized persons from accessing animals at the facility as well as functioning as a secondary form of containment for the animals. Because of this lack of perimeter fencing, the licensee lost two arctic foxes, who escaped after a tree fell on their box.

Repeat citations were issued to Kokas for failing to maintain an inventory of animals on hand or acquisition records for animals acquired since the previous inspection; failing to provide clean water receptacles (approximately 40% of the water receptacles for the foxes, raccoons, groundhogs, and skunks and all the receptacles for the ferrets and minks had chew or scratch damage or had accumulated layers of calcium or organic materials); and failing to properly clean 20% of the food receptacles for the foxes, raccoons, skunks, ferrets, and minks. There was an excessive amount of rust or accumulations of old food present on them. Many of the food receptacles didn't have a top or cover to prevent rain from getting into the food.

February 8, 2022: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany officials for access and inspection of records and property.

February 7, 2022: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany officials for access and inspection of records and property.

January 26, 2022: The USDA issued Kokas a critical citation for refusing to allow an inspection. When inspectors contacted the licensee to initiate the inspection, the licensee became agitated and asked why he was being inspected so frequently. As the inspector began to explain the purpose of the inspection, the licensee didn't appear to be listening and continued yelling aggressively with explicit language. When given a warning that the inspectors would leave and the interaction would be cited as a refusal to allow inspection, the licensee told them to leave while shouting expletives. He continued to shout while inspectors entered their vehicles, and one inspector needed to ask the licensee to get out of the way so that they could leave the property. The licensee continued to shout at them as they pulled out of his driveway.

January 14, 2022: The USDA issued Kokas an official warning for seven previous alleged violations, noting that if the agency obtained "evidence of any future violation of these federal regulations, [it] may pursue civil penalties, criminal prosecution, or other sanctions for th[ese] alleged violation(s) and for any future violation(s)." See December 15, 2021; November 22, 2021; and September 16, 2021, below.

December 27, 2021: The USDA issued Kokas a repeat citation for failing to have a perimeter fence to protect animals by restricting animals and unauthorized persons from accessing the facility and functioning as a secondary containment system for the animals.

December 15, 2021: The USDA issued Kokas a repeat citation for failing to provide 20 arctic foxes with appropriate shelter. The animals' enclosures had either nothing acting as an additional wind or rain break or a small section of shingle-like paper material covering little more than half of the roof, which wasn't sufficient to afford adequate protection from the elements. Another repeat citation was issued because Kokas failed to provide clean water receptacles. Roughly 20% of the water receptacles for the foxes, raccoons, and skunks had chew or scratch damage or had accumulated layers of calcium or organic materials and still had deposits of brown, red, or black material embedded into the scratch marks or chewed areas.

A direct repeat citation was issued to Kokas for failing to have a perimeter fence. A loose raccoon was observed walking on the ground near the regulated animal enclosures. The records were inadequate to confirm whether the raccoon was a regulated animal or wild. This raccoon interacted and touched noses with at least one of the licensee's raccoons through the cage wire, posing a disease hazard.

December 2, 2021: The USDA issued Kokas a repeat citation for failing to have a

responsible adult available to accompany officials for access and inspection of records and property.

November 22. 2021: The USDA issued Kokas a critical citation for direct interference by facility representatives with the agency's inspection process by not making all regulated animals on the premises available for the September 16, 2021, routine inspection. Records reviewed during this inspection indicated that a number of animals were on the premises during the previous inspection but hadn't been made available for the inspection. including hedgehogs, alpacas, fallow deer, and spotted rock squirrels. At several points during the September inspection, the facility representative had been asked, "Have we seen all the animals here today?" and the answer had been, "Yes."

Kokas was issued a direct citation for failing to provide a number of animals who had eye problems with adequate veterinary care. The facility didn't have any ocular medications on hand, even though staff stated that they had been treating these animals. In addition, the program of veterinary care didn't provide any instructions for treatments and the attending veterinarian hadn't been consulted on any of these specific conditions:

- A mutant white mink had dark, crusted material along flecks of blood and matted fur surrounding his right eye. This animal seemed agitated and was pacing in his cage.
- An arctic fox appeared to have respiratory difficulty. The noise the animal was making sounded like a raspy snore or stertor, but facility representatives stated that he was growling. After several minutes of observation, the animal continued to breathe in this manner, with pronounced

abdominal movements in time with each breath.

- A white-colored red fox had a small amount of thick, yellow, purulent discharge and a large amount of dark crusted material and matted fur at the inner corner of the left eye.
- Nearly all the arctic foxes as well as some of the red foxes had large piles of soft to runny/pasty diarrhea accumulated on the ground under the wire cage bottoms of their enclosures.

A repeat citation was issued to Kokas for failing to give the attending veterinarian appropriate authority to ensure the provision of adequate veterinary care. The facility representatives stated that they would give different dewormers at different times of the year and that they would generally use the dosing instructions given on the labels. The labels for one bottle of Panacur and one bottle of Ivermectin contained dosage instructions only for horses, cattle, or swine. The written program of veterinary care didn't provide any specific schedule, screening, or indication for deworming, nor did it contain dosing or rotation instructions for the species maintained at the facility. In addition, facility personnel have performed surgical procedures (anal sacculectomy) on skunks, but the written protocol was missing the following pieces of information:

- How to perform the anal sac removal (step by step)
- Post-procedural care instructions
- Pain control measures

A direct citation was issued to Kokas for failing to provide 83 red foxes, 29 arctic foxes, and three skunks who didn't have protection from wind, rain, snow, or other weather extremes with appropriate shelter. The previous overnight low had been 21 degrees, and the high on the day of inspection was 37 degrees. Kokas was also cited for failing to provide at least 33 red foxes and 5 raccoons with adequate protection from inclement weather.

A direct repeat citation was issued to Kokas for failing to provide water:

- A red fox was seen scratching continuously at an empty water bowl.
 When a facility representative was pressed to fill the dish, the fox drank the water nearly continuously for almost four minutes.
- A raccoon played with one or two large ice chunks (the only remnants of water available in the water dish), passing them back and forth between their front paws and alternatively putting them in their mouth to chew.
- Several other animals were observed scratching at or licking the bottom of empty water dishes.
- There were large deposits of diarrhea under the cages of a large number of arctic and red foxes. Diarrhea causes dehydration when not adequately compensated for with an appropriate intake of fluids.

In addition, at least 45% of the water receptacles for the foxes, raccoons, and skunks had chew or scratch damage and still had deposits of brown, red, or black material embedded into the scratch marks or chewed areas.

The USDA issued Kokas repeat citations for failing to have disposition records for 12 domestic cats who had been removed since the last inspection; failing to maintain up-todate acquisition and disposition records for animals on the premises, resulting in a discrepancy of 46 animals on the total inventory; failing to have a perimeter fence to protect animals by restricting them and unauthorized persons from accessing the facility and functioning as a secondary containment system; failing to supply food receptacles free from an excessive amount of rust (which could have exposed the animals to contamination and unnecessary disease hazards) to foxes, raccoons, ferrets, skunks, and mink; and failing to maintain enclosures in good repair. Forty percent of the wire enclosures for skunks, raccoons, red foxes, coatimundis, and minks had excessive amounts of rust, and one enclosure for a Prevost's squirrel had two wooden shelter boxes with sharp points. Kokas was additionally cited for failing to store food in a way to prevent mold, spoilage, or contamination; failing to provide rabbits with adequate shelter from the elements; and failing to adequately clean the enclosure for two rabbits, which had a pile of hay or straw covered with fecal pellets spanning roughly a third of the enclosure.

Lastly, Kokas was issued a direct citation for failing to have an adequate number of trained personnel to properly maintain the professionally accepted level of husbandry practices for the number of animals present at the facility. When inspectors arrived at the facility around 10:30 a.m. for the inspection, the facility representative stated that none of the animals had been fed or cared for that morning due to other obligations that required her attention prior to her arrival. The licensee or representative made the following comments throughout the inspection:

- "They would have water by now, if you were not here."
- "With all these animals, it take[s] time."
- "Do you know how long it takes for all these animals?"
- "It's hard to keep up when I have another job."

October 25, 2021: The USDA issued Kokas a repeat citation for failing to have a responsible adult available to accompany

officials for access and inspection of records and property.

September 16, 2021: The USDA cited Kokas for failing to ensure the attending veterinarian had appropriate authority to ensure the provision of adequate veterinary care. Facility personnel performed anal gland removal on skunks in a nonsterile room and without using separate sterile instruments for each animal or properly sterilizing the reused instruments between surgeries. The written protocol was incomplete, with no guidance provided for performing the anal sac removal, no postprocedural care instructions, and no pain control measures. The attending veterinarian confirmed that guidance was provided but had never observed the procedure or had direct oversight to ensure that proper procedures and protocols were being followed.

A direct citation was issued to Kokas for failing to clean a raccoon enclosure. The den box had an excessive amount of excreta piled up, and a facility representative indicated that the waste buildup hadn't been cleaned or removed for "about 2 weeks." The den box was the only form of shelter that the raccoons had access to in the enclosure. At least 85% of enclosures housing skunks, raccoons, red foxes, coatimundis, and minks throughout the facility had an excessive amount of food waste, excreta, and other organic waste piled up underneath. The enclosures were not uniform and were suspended at different heights. The higher enclosures had waste and excreta piled at least a foot to knee high under the enclosure. Enclosures lower to the ground had excreta and waste buildup approximately 1 to 2 inches from touching the enclosure floor. Even though these enclosures were in an outdoor area, a very strong odor was present that "caused burning of the eyes and throat of both inspectors."

The agency cited Kokas for housing five adult domestic "munchkin" cats outdoors without approval from the attending veterinarian, where the animals could be susceptible to heat exhaustion, dehydration, or hypothermia; failing to provide five domestic cats in two outdoor enclosures housing that was impervious to moisture and able to be properly cleaned and sanitized (the wooden den box and enclosure frame were constructed of unsealed wood); failing to provide five domestic cats in four outside enclosures elevated resting surfaces; and failing to keep enclosures structurally sound and in good repair.

- An excessive amount of rust was present in over half the wire enclosures housing skunks, raccoons, red foxes, coatimundis, and minks.
- A white-nosed coatimundi enclosure had about a 2-inch hole in the front of the wire mesh enclosure, large enough for the animal to stick their muzzle through. The area also had sharp points, where the wire had been cut or broken off.
- An elevated wire mesh enclosure containing two red foxes had rotting and broken wooden support structures that were used to raise the wire mesh floor of the enclosure off the ground.

The USDA issued Kokas two repeat citations. The first was for failing to have a perimeter fence to protect animals by restricting other animals and unauthorized persons from accessing the facility and functioning as a secondary containment system. The second was for failing to provide water receptacles that could be properly cleaned—about 75% of the water receptacles for the foxes, raccoons, and skunks had rust or chew damage that prevented proper cleaning or sanitation, and several of the water receptacles had a buildup of green organic material or reddishbrown matter buildup.

Kokas was also cited for failing to provide skunks and minks with food receptacles free from an excessive amount of rust. The animals could have been exposed to contamination and unnecessary disease hazards. He was also cited for failing to have proper identification for 12 domestic cats, failing to maintain records of acquisition for the domestic cats, and failing to maintain up-to-date acquisition or disposition records for animals on the premises, which resulted in a discrepancy of 125 animals on the total inventory.

July 15, 2021: The USDA cited Kokas for failing to have a responsible adult available to accompany officials for access and inspection of records and property.

November 26, 2019: The USDA cited Kokas for failing to have a perimeter fence to protect animals by restricting other animals and unauthorized persons from accessing the facility and functioning as a secondary containment system.

Kokas was cited for failing to provide water receptacles that could be properly cleaned—about 75% of the water receptacles for the foxes, raccoons, and skunks had rust or chew damage that prevented proper cleaning or sanitation, and several of the water receptacles had a buildup of green organic material or reddishbrown matter buildup.

June 20, 2018: The USDA cited Kokas for failing to have a responsible adult available to accompany officials for access and inspection of records and property.

April 21, 2016: The USDA cited Kokas for performing descenting surgery on baby skunks when the surgical procedure hadn't

been described or approved by the attending veterinarian.

September 19, 2012: The USDA issued Kokas two citations for failing to provide 19 chinchillas, whom the licensee believed had a parasite, with adequate veterinarian care. Kokas was cited for the following:

- Treating chinchillas with a medication called Wazine-17, even though the attending veterinarian hadn't diagnosed the animals or approved the treatment plan
- Failing to communicate with the attending veterinarian regarding the potential parasite problem affecting the 19 chinchillas

Kokas was also cited for failing to provide minks with sanitary food receptacles. Seventeen metal feeders were rusty and in need of repair or replacement to provide food free of possible rust contamination.

September 20, 2011: John Kokas, the 80year-old father of Craig Kokas, was hospitalized after he was attacked on the family's farm by a 6-foot-tall, 200-pound male red kangaroo. A family member said they planned to euthanize the kangaroo.

August 6, 2011: The USDA cited Kokas for failing to have the required, regularly scheduled annual site visit by the attending veterinarian to offer guidance and veterinary care. The licensee's program of veterinary care was dated October 20, 2009.

Kokas was also cited for failing to keep the sika deer's primary enclosure fence structurally sound. Areas were leaning inward and in need of repair after a tree had fallen on it. The USDA also cited him for failing to have a perimeter fence to protect 39 animals by restricting unauthorized persons from accessing them and functioning as a secondary containment system.

