

August 6, 2024

Roxanne Mullaney, D.V.M.
Deputy Administrator
USDA/APHIS/Animal Care

Via e-mail: [REDACTED]; ac.complaints@usda.gov

Re: Request to Investigate Zoological Wildlife Foundation (License No. 58-C-1275) for Apparent Animal Welfare Act Violations

Dear Dr. Mullaney:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture (USDA) investigate Zoological Wildlife Foundation (“ZWF”; license no. 58-C-1275) for the following apparent Animal Welfare Act (AWA) violations involving injuries to members of the public and employees documented in Florida Fish and Wildlife Conservation Commission (FWC) records.

- On May 12, 2024, a child was bitten by a capuchin monkey, Romeo, during an encounter. The guest went to the hospital for treatment and a tetanus shot. ZWF was ordered to discontinue using Romeo for encounters. (*See Exhibit 1.*)
- On January 20, 2024, three children were bitten by the same capuchin monkey, Romeo, during an encounter. They required first aid, and one child was taken to urgent care for treatment and a tetanus shot. The USDA cited ZWF for this incident on May 7,¹ although there appear to be some discrepancies in the information provided. The USDA citation was for two children who had been scratched by Romeo, but the documents refer to three children being bitten. (*See Exhibit 2, Exhibit 3, Exhibit 4, and Exhibit 5.*)
- On February 27, 2023, licensee Mario Tabraue was bitten by a Gila monster while attempting to treat the lizard for a medical problem and was taken to the hospital in anaphylactic shock and in “severe pain.” He was hospitalized until March 3, 2023. While reptiles are not regulated by the USDA, this incident underscores the reckless handling prevalent at ZWF. (*See Exhibit 6.*)
- On January 7, 2023, a guest was severely bitten by a capuchin monkey, Abella, who got loose from her handler. (*See Exhibit 7.*)
- On January 14, 2022, an employee was scratched by an Endangered Species Act-protected jaguar while feeding him and received stitches at the hospital. (*See Exhibit 8.*) This was not the first time a big cat injured a human at ZWF, including multiple public visitors.

It appears ZWF is exhibiting animals in a manner that violates 9 C.F.R. § 2.131(c)(1), which requires that “any animal must be handled so there is minimal risk of harm to

¹ See USDA inspection report, Zoological Wildlife Foundation, license no. 58-C-1275, May 7, 2024.

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 OPERATING
NAME OF THE FOUNDATION TO
SUPPORT ANIMAL PROTECTION.

ENTITIES:

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

the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public” and *Id.* § 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.”

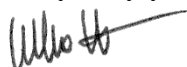
Furthermore, pursuant to 9 C.F.R. § 3.77(g), “primates may be permitted physical contact with the public ... but only if they are under the direct control and supervision of an experienced handler or trainer at all times during the contact.” When primates are used in public encounters, [injuries are inevitable](#)—and many exhibitors have been cited by the USDA for allowing primates to climb on members of the public, even when restrained by a handler with a leash.

Inappropriate handling causing injuries to staff or members of the public can result in regulated animals having to be euthanized for rabies testing, and other facilities have been routinely cited for similar incidents.² ZWF has been cited by the USDA on several occasions for failing to provide sufficient distance and/or barriers between the public and animals, including several other incidents which resulted in bites.³

Please ensure that ZWF is providing all animals with adequate veterinary care, shelter, space, food, and water and that the animals are otherwise handled in accordance with the AWA and its regulations. Please also hold the licensee and any and all responsible parties fully accountable for all violations that you discover during your investigation.

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.
Senior Wildlife Specialist, Captive Animal Law Enforcement

cc: Dr. Gwendalyn Maginnis, Nonhuman Primate Specialist [REDACTED]
Dr. Laurie Gage, Zoological Species Specialist [REDACTED]
Devon Flanagan, Senior Trial Attorney, Wildlife and Marine Resources Section (WMRS),
U.S. Department of Justice (DOJ) [REDACTED]
Meredith Flax, Deputy Section Chief, WMRS/DOJ [REDACTED]
Jay Govindan, Section Chief, WMRS/DOJ [REDACTED]

² See USDA Inspection Reports, Exotic Animal Exhibits LLC, license no. 55-C-0294, April 4, 2024; Oak Meadow Productions LLC, license no. 74-C-1123, March 12, 2024; Tami Holliman, license no. 65-C-0568, November 18, 2022; John Mark Johnson, license no. 65-C-0566, September 21, 2022; York’s Wild Kingdom, license no. 11-C-0001, September 1, 2022; Hand Me Down Zoo, license no. 57-C-0376, February 2, 2022; Barn Hill Preserve, license no. 72-C-0238, June 16, 2021.

³ See USDA Inspection Reports, Zoological Wildlife Foundation, license no. 58-B-0306, October 7, 2014, July 15, 2021, and February 15, 2023.