

EXHIBIT BB –
December 15, 2020
Inspection Report



United States Department of Agriculture
Animal and Plant Health Inspection Service

DCUNNINGHAM
2016090000494025 Insp_id

Inspection Report

JEFFREY LOWE
21619 Jimbo Road
THACKERVILLE, OK 73459

Customer ID: **332646**
Certificate: **73-C-0230**
Site: 002
Jeffrey Lowe- 002

Type: ROUTINE INSPECTION
Date: 15-DEC-2020

2.75(b)(1) Repeat

Records: Dealers and exhibitors.

Acquisition and disposition records were missing or unavailable at time of inspection and at least 60 animals could not be accounted for when comparing inventories. The following are examples of the unaccounted animals: tiger, lion, other large felids, kangaroo, wolf, sloth, hedgehog, woolly opossum, nonhuman primate, raccoon, pig, bear, bobcat, and skunk. Acquisition and disposition records are necessary to be able to accurately track animals being used in regulated activities to ensure their legal acquisition, proper care, and humane transportation.

Animals transferred to or acquired from other licensees must have disposition and acquisition records containing all information required by the Animal Welfare Act Regulations available for inspection. This requirement applies to all regulated animals purchased or otherwise acquired, owned, held, leased or otherwise in possession of or under control of the licensee, and all regulated animals transported, sold, euthanized, or otherwise disposed of by that dealer or exhibitor. The record shall include any offspring born of any animal while in his or her possession or under his or her control.

2.40(b)(2) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

Prepared By: DEBBIE CUNNINGHAM
USDA, APHIS, Animal Care

Date:
21-DEC-2020

Title: VETERINARY MEDICAL
OFFICER

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A previously cited geriatric wolf hybrid named "Cochise" was in an exhibit by himself, removed from the rest of the wolves. He appeared thin and moved slowly. The hip bones were easily visible and there was an exaggerated abdominal tuck. The facility representative stated he was old and arthritic. When asked what they were doing to provide for Cochise's medical needs, the representative said they were providing chopped food and taking him for a walk every day. There were no medical records to evaluate regarding a plan for care from a veterinarian or if his previously prescribed medications are being administered as directed.

A lion named "Simba" was in an enclosure with a hybrid cat named "Mani". "Simba" appeared thin and had areas of hair coat loss near the hip area. The spinous processes of the vertebral bodies and hip bones were easily visible. He remained lying down throughout the time he was observed. When asked about any special care for Simba, the facility representative stated that he was being given a weight gain supplement. The only diet supplement at the facility during the inspection was "Gleam and Gain" which is a horse product. There were no medical records to evaluate regarding a plan for care from a veterinarian including the use of a horse supplement for a lion.

Weight loss and hair coat changes, especially in geriatric animals, can be as a result of problems such as but not limited to numerous metabolic diseases and other illnesses, changing dietary requirements, and/or intestinal parasites. The facility representative must ensure that all animals receive adequate veterinary approved nutrition and medical care at all times which includes appropriate methods to prevent, control, diagnose and treat diseases and injuries.

3.125(a) **Repeat**

Facilities, general.

One enclosure containing "Sonic" the porcupine has a metal grate sub-floor that is exposed in two areas on the sides of the enclosure. Sonic was digging in the dirt of the enclosure to express normal behavioral activities. This exposed grate

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has openings approximately 4 x 4 inches wide that could cause entrapment or injury to the animal. The facility representative must ensure all housing facilities must be structurally sound and maintained in good repair to protect the animals from injury.

Corrected during the inspection.

2.40(b)(3) **Direct** **Repeat**

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A liliger named "Django" was lame on its right front leg during the inspection. A veterinarian had not been consulted nor had any treatment been provided at the time of inspection since the condition had not been observed or reported by facility. Gait abnormalities can result from problems such as but not limited to injury, orthopedic problems, and/or metabolic and diet problems. Limping also indicates the animal is painful. Failure to observe medical problems and then communicate those problems to the attending veterinarian can result in prolonged pain or medical problems. The facility representative must observe all animals daily and then ensure a mechanism of direct and frequent communication with the attending veterinarian so that timely and accurate information on problems of health, behavior, and well-being are conveyed.

2.40(a)(2) **Repeat**

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

The facility representatives have not employed an attending veterinarian (AV) under formal arrangements. As such, they also do not have a written program of veterinary care (PVC) from a veterinarian acting in that capacity. The facility representatives stated they do not need a PVC because they are not licensed, however, they stated they are in discussion with 2 different veterinarians regarding the role of AV for the facility. Failure to employ an AV and subsequent lack of a program of veterinary care, leaves the facility without direction to provide adequate veterinary care to the animals and does not ensure regularly scheduled visits to the premises. The facility representative must employ an attending

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veterinarian under formal arrangements. In the case of a part time or consultant veterinarian, these formal arrangements must include a written program of veterinary care and regularly scheduled visits to the premises.

3.75(c)(1)(i)

Housing facilities, general.

In the commissary building, a portion of the bottom metal support rail of a lemur enclosure was rusted leaving a roughened surface. This enclosure housed two lemurs named "LaLa" and "Suni Boy". Rough, rusted metal creates a surface that cannot be adequately cleaned and sanitized. In addition, not having cleaned and sanitized surfaces plays a role in disease transmission. The facility representative must ensure that all housing facility surfaces in contact with nonhuman primates be free of excessive rust that so that appropriate cleaning and sanitization can occur.

To be corrected by: January 1, 2021

3.127(d)

Facilities, outdoor.

The perimeter fence had the following problems:

- One area near the walk-through gate at the front of the facility was sagging at the top and measured a height of 7 feet 9 inches.
- The utility gate which is part of the perimeter fence near the rear of the facility had a gap under the gate to the ground measuring 11 inches.
- One area had a gap measuring 9.5 inches from the ground to the perimeter fence.
- The two front gates that are part of the perimeter fence have decorative top that slopes down on each side to a height of approximately 6 feet. There are also gaps under these two gates.
- The perimeter fence on the west side of the park had a broken 4X4 post as part of one of the H braces.
- There are 3 adjacent posts without staples holding the perimeter fence to the posts creating a gap between the fence

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and the posts.

-There were two areas where the perimeter fence crossed a creek. These gaps were approximately 2 feet and 2.5 feet under the perimeter fence.

Problems with the perimeter fence can provide unwanted and unauthorized people and animals access to the facility.

Based on the animal species maintained within the facility, the facility representative must ensure that the perimeter fence is at least 8 feet high. The perimeter fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized people from going through it or under it and so that it can function as a secondary containment system for the animals in the facility.

To be corrected by: January 15, 2021

3.81

Environment enhancement to promote psychological well-being.

The environmental enhancement plan that was provided during the inspection has not been approved by an attending veterinarian. There is no attending veterinarian for the facility yet to oversee this enrichment plan for nonhuman primates.

There were toys in each enclosure but no written accounting of whether the toys were changed or if other forms of enrichment were in use. An inadequate plan of enrichment for nonhuman primates can result in animals with high levels of stress and/or boredom that affects both their health and behavior. The facility representative must develop, document and follow an appropriate plan for the environmental enhancement adequate to promote the physiological wellbeing of nonhuman primates. The Nonhuman Primate Enrichment plan must be in accordance with professionally accepted standards and directed by the attending veterinarian.

To be corrected by: January 1, 2021

3.129(a)

Repeat

Feeding.

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The adult tigers and lions are being fed a boneless chicken meat diet. This was the only food for the big cats observed on the property at the time of the inspection. The facility representative said they also regularly feed deer and cows but none were seen in the food storage areas during the inspection. Inspectors were told that the frozen rabbits seen in the commissary were being used to feed the snake. Inspectors asked to see the supplements the cats were being provided and were shown a product called Gleam & Gain which is horse weight gain supplement. The facility representative said they also use "Oasis", "Wild Tracks" and calcium as supplements but had none at the facility at the time of the inspection and were planning to buy more that day. Feeding a boneless meat diet without calcium supplementation can result in nutritional deficiency, disease, malformed bones, gait abnormalities, and fractures.

Gleam & Gain is not a complete supplement for tigers eating a boneless meat diet. It lacks the vitamins and minerals necessary to balance a boneless chicken meat diet. The amount of calcium in this supplement is not a practical supplement for a boneless meat diet. Approximately 5 grams of calcium carbonate are required to properly supplement one pound of boneless meat for a big cat. There appears to be about 250 – 500 mg of calcium in each 2 oz scoop of Gleam & Gain so it would require at least 20 oz of this product per pound of meat fed to each cat per day to meet the minimum calcium requirements when used as a supplement for cats who are fed a boneless chicken meat diet. The facility representatives have a history of feeding inadequate diets to big cats, and previous to this inspection, two big cats in their care were diagnosed with Metabolic Bone Disease, a preventable disease that is caused by a lack of calcium and other nutrients in the diet. One of the big cats is presently exhibiting lameness, which is often an early sign of this disease.

The chicken breasts are being stored in the food storage truck and were shown to be solidly frozen. In preparation for feeding, the chicken breasts are removed from the truck and thawed on the ground, outside and next to the truck. Some

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of the cardboard boxes of chicken breasts were open are not protected in any way from contamination from dirt or pests.

The facility representative must ensure that food shall be wholesome, palatable, and free from contamination and of sufficient quantity and nutritive value to maintain all animals in good health. The diet shall be prepared with consideration for the age, species, condition, size, and type of the animal.

2.126(a)(2)

Access and inspection of records and property; submission of itineraries.

Inspectors asked for acquisition, disposition and health records and were told they were unavailable because they were at the attorney's office. The facility representatives attorney was present during the inspection and no records were provided to the inspectors. Review of records required by the Animal Welfare Act facilitates the inspection process by allowing inspectors to determine compliance of documents and evaluate animal welfare. The facility representative must, during business hours, allow APHIS officials to examine records required to be kept by the Animal Welfare Act and the regulations.

To be corrected by: January 1, 2021

3.128

Space requirements.

Some of the big cats are being housed temporarily in enclosures that measure 8 feet wide by 14 feet long by 7 feet tall according to the facility representative. Adult cats must be able to exhibit normal postural adjustments and require more than 7 feet of height in an enclosure in order to freely stand on their rear legs and stretch. The facility representative must ensure that all animals housed in enclosures that are constructed and maintained so as to provide sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement.

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3.127(b)

Facilities, outdoor.

Most of the enclosures housing the big cats do not provide shelter from inclement weather. While big cats are generally cold weather tolerant, protections from discomfort due to climatic conditions such as wind, rain, and snow is required. Some of the larger enclosures have roof space that would allow the animals to remain dry in case of wind, rain, and snow but most of the enclosures would not. Even animals that are cold weather tolerant may be adversely affected by windy and wet conditions and be uncomfortable. The facility representative must ensure that natural or artificial shelter appropriate to the local climatic conditions for the species concerned shall be provided for all the animals kept outdoors to afford them protection and to prevent discomfort to such animals.

To be corrected by: January 1, 2021

3.78(a)

Outdoor housing facilities.

Two macaques were housed in adjacent outdoor enclosures. The facility did not have an attending veterinarian at the time of the inspection. An attending veterinarian has not determined that these macaques are adequately acclimated to outdoor housing during this time of year. Based on observations they are not well acclimated. The Kestrel thermometer at the time of the inspection measured 41.8 degrees Fahrenheit. Failure to have correctly acclimated nonhuman primates housed in outdoor housing conditions can lead to hyperthermia or hypothermia. The facility representatives must ensure that nonhuman primates are acclimated, as determined by the attending veterinarian, to the prevailing temperature and humidity at the outdoor housing facility during the time of the year they are at the facility. They must also be able to tolerate the range of temperature and climatic conditions known to occur at the facility at that time of the year without stress or discomfort in order to be kept in outdoor enclosures.

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To be corrected by: December 27, 2020

2.131(b)(1) Direct

Handling of animals.

Two macaques were housed in adjacent outdoor enclosures, one with a metal crate and one with plastic barrel (open at each end) for shelter structures. The metal constructed enclosures and the metal shelter conduct cold in a manner that could harm the animals especially the digits of the hands and feet in cold weather. The ears and tail are also at risk of frost bite. Straw was used as a bedding. Supplemental heat was provided by a forced air heater directed at a cinderblock wall between the two enclosures. The plastic barrel was mounted on the enclosure wall above the level of the heater. The set up did little more than to forcibly blow heated air into the open environment adjacent to the enclosure. In fact, the loud and forceful nature of the heater may have discouraged the animals from use of cage space near the heater. One macaque was observed sitting hunched up with its limbs pulled very close to its body, as one does when they are very cold and trying to conserve body heat.

The facility representative must handle animals as expeditiously and carefully as possible in a manner that does not cause excessive overcooling, trauma, stress, physical harm or unnecessary discomfort. The housing design and strategy for supplemental heat failed to protect the macaques and caused excessive overcooling and distress.

To be corrected by: December 23, 2020

This inspection was conducted with facility representatives.

Additional Inspectors:

MARGARET SHAVER, VETERINARY MEDICAL OFFICER

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Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
332646	73-C-0230	002	Jeffrey Lowe- 002	15-DEC-2020

Count	Scientific Name	Common Name
000003	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000002	<i>Puma concolor</i>	PUMA / MOUNTAIN LION / COUGAR
000001	<i>Lama pacos</i>	ALPACA
000008	<i>Lemur catta</i>	RING-TAILED LEMUR
000003	<i>Vulpes vulpes</i>	RED FOX (INCLUDES SILVER FOX & CROSS FOX)
000003	<i>Sheep</i>	SHEEP
000001	<i>Vulpes lagopus</i>	ARCTIC FOX
000006	<i>Lynx rufus</i>	BOBCAT
000001	<i>Camelus dromedarius domestic</i>	DOMESTIC DROMEDARY CAMEL
000005	<i>Caracal caracal</i>	CARACAL
000001	<i>Canis latrans</i>	COYOTE
000001	<i>Capra hircus</i>	DOMESTIC GOAT
000001	<i>Lynx canadensis</i>	CANADIAN LYNX
000001	<i>Prionailurus viverrinus</i>	FISHING CAT
000007	<i>Panthera leo</i>	LION
000001	<i>Panthera onca</i>	JAGUAR
000001	<i>Potos flavus</i>	KINKAJOU
000004	<i>Mustela putorius furo</i>	DOMESTIC FERRET
000063	<i>Panthera tigris</i>	TIGER
000016	<i>Panthera leo X P. tigris</i>	LION X TIGER HYBRID / LIGER / TIGON
000001	<i>Caluromys philander</i>	BARE-TAILED WOOLLY OPOSSUM
000002	<i>Atelerix albiventris</i>	FOUR-TOED HEDGEHOG
000001	<i>Pigs</i>	PIGS
000009	<i>Procyon lotor</i>	RACCOON
000001	<i>Saguinus midas</i>	RED-HANDED TAMARIN
000004	<i>Canis lupus</i>	GRAY WOLF / GREY WOLF / TIMBER WOLF
000003	<i>Callithrix jacchus</i>	COMMON MARMOSET
000001	<i>Galago senegalensis</i>	NORTHERN LESSER BUSHBABY
000001	<i>Spermophilus richardsonii</i>	RICHARDSON'S GROUND SQUIRREL
000001	<i>Canis aureus</i>	GOLDEN JACKAL
000001	<i>Macaca mulatta</i>	RHESUS MACAQUE
000001	<i>Macaca nemestrina</i>	PIG-TAILED MACAQUE
000001	<i>Otocyon megalotis</i>	BAT-EARED FOX
000156	Total	



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