

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

UNITED STATES' NOTICE OF DEFENDANTS' CONTINUED NONCOMPLIANCE

At the May 12, 2021 show cause hearing and in the Court's subsequent order, Dkt. 97, the Court found Defendants in civil contempt for failing to comply with the Court's previous orders and imposed sanctions. The Court stated that it would consider further sanctions if Defendants were not fully compliant with the Court's January 15, 2021 and March 22, 2021 orders by June 11, 2021. Dkt. 97 at 8. At the show cause hearing, the Court invited the United States to file a notice informing the Court if Defendants did not come into compliance by June 11, 2021.

Not only have Defendants failed to cure the deficiencies identified by the United States in the motion to enforce and subsequent notices of noncompliance, but they have added additional violations of the Court's orders. Dkt. 72, 83, 93. Specifically, Defendants continue to violate the Court's orders by: (1) not retaining *any* attending veterinarian, let alone a qualified veterinarian

with whom they must prepare a legally sufficient written program of veterinary care consistent with the Animal Welfare Act (“AWA”) regulations; (2) continuing to ignore their obligation to confer with the United States and obtain leave of Court before acquiring or disposing of animals; and (3) failing to produce complete and accurate acquisition or disposition records and veterinary records by the Court-ordered deadlines.

Given that Defendants seem unfazed by the Court’s contempt finding and the existing sanctions, the United States believes additional sanctions are necessary to ensure Defendants come into compliance with the Court’s orders. Such sanctions are particularly important in this case where Defendants’ continued defiance of the Court’s orders puts the animals in their care in danger.

I. Defendants continue to Ignore, Defy, and Violate the Court’s Orders.

A. Defendants have not retained a qualified attending veterinarian under formal arrangements.

One of the most alarming updates since the Court’s May 12, 2021 hearing is the withdrawal of Defendants’ former veterinarian and Defendants’ apparent failure to secure a replacement. During the May 12, 2021 show cause hearing, the United States shared with the Court and the Lowes a communication from the Lowes’ veterinarian in which she indicated that she was going to give notice and cease working with them by the end of May. Exhibit (“Exh.”) 6 (Partial Transcript for May 12, 2021 Show Cause Hearing) at 26:8-25. On May 26, 2021, the Defendants’ former veterinarian informed the U.S. Department of Agriculture’s (“USDA”) Animal and Plant Health Inspection Service (“APHIS”) that she no longer worked for Defendants and had stopped all communications with them. *See* Dkt. 100-9. During the June 2, 2021 APHIS inspection of Tiger King Park, Defendant Lauren Lowe initially claimed that they were still working with Dr. Fryer. When the APHIS inspectors noted that Dr. Fryer had informed

USDA that she was no longer working with the Lowes, Lauren Lowe then admitted that they had no qualified attending veterinarian. *See* Exh. 1 (Decl. Dr. Cynthia Digesualdo) ¶ 3.

To date, Defendants have not informed the United States that they have obtained a new attending veterinarian, let alone one that meets the requirements of the AWA regulations, 9 C.F.R. §§ 1.1, 2.40. Defendants' former program of veterinary care was legally deficient, as the Court found in its March 22, 2021 order, *see* Dkt. 78 at 8-9, and now is obsolete because the plan was with a veterinarian who is no longer providing services at the Thackerville facility. Thus, Defendants continue to defy the Court's January 15, 2021 order requiring them to "retain a qualified attending veterinarian under formal arrangements consistent with the requirements of 9 C.F.R. §§ 1.1, 2.40" and have a program of veterinary care consistent with the regulations. Dkt. 65 at 33.

Having no attending veterinarian puts the animals at the Thackerville facility at risk of avoidable suffering, injury, and death, defies court orders, and violates the AWA. For example, at the May 12, 2021, hearing, counsel for United States brought to the attention of the Court reports that a red fox at the Thackerville facility was suffering and that the Lowe's former veterinarian had inquired about the legal steps that needed to be taken to humanely euthanize the animal. In a May 14, 2021 order, the Court approved the humane euthanasia of the red fox as the parties may stipulate. Dkt. 96. Despite the efforts of the United States and the Court to facilitate the humane treatment of this animal, Defendants have taken no steps to reach a stipulation. Nor have they provided any veterinary records that demonstrate that the animal is receiving adequate care. Instead, the Lowes have unilaterally decided to simply watch the animal die.

On June 2, 2021, APHIS inspected the Thackerville facility. *See* Exh. 2 (June 9, 2021 Inspection Report). The inspection report indicates that the veterinarian's recommendations for

the fox dated February 20, 2021, had not been followed and that the May 1, 2021 daily record for the animal states that Defendants plan to “allow him to pass away peacefully when it’s his time.” *Id.* at 3. Further, that record describes his condition as “possible cancer is now getting to him.” Exh. 3 (records produced by Lauren Lowe at June 9, 2021 inspection) at 2. The inspection report also notes that the red fox “continues to receive no veterinary care” for its known chronic medical conditions. Exh. 2 at 3. Defendants’ failure to retain an attending veterinarian means no qualified individual is available to treat this animal, monitor the extent of his suffering, or perform a humane euthanasia. *See* Exh. 1 ¶ 7.

The June 2, 2021 APHIS inspection revealed several other animals in need of veterinary care, including a ferret, a raccoon, a bush baby, and two bobcats. Exh. 2 at 2-4. Lauren Lowe presented a record for the bush baby, which stated that the animal has a “bed sore on his right side and rash above left eye. Applying Vaseline every other day. Will continue to monitor.” Exh. 3 at 3. It also noted a decrease in the animal’s energy level. *Id.* Notably the record is dated May 27, a day after Dr. Fryer told USDA that she no longer worked for the Lowes. Dkt. 100-9. Dr. Fryer told USDA that she had never been informed that the bush baby had any medical issues or asked to examine it. Exh. 2 at 3. Either the record is based on the Lowes’ unqualified assessment of the medical needs of their animals or they consulted with another veterinarian but failed to comply with the Court’s order to provide “complete and accurate veterinary records to counsel for the United States within 7 days of any animal being treated by a veterinarian.” Dkt. 65 at 34.

USDA observed a ferret with swelling that encompassed the entire width of the animal’s neck. Exh. 2 at 2. Although the Lowes had noticed the swelling at least on June 1, 2021, they had not contacted a veterinarian. *Id.* More than two weeks later, the United States has not received any veterinary records for the animal. A raccoon was “lethargic with an overall unthrifty

appearance.” *Id.* The animal also “seemed to be isolating himself from the other animals which is not normal” for raccoons. *Id.* at 2-3. The APHIS inspectors also observed hair loss on a female bobcat. *Id.* at 3. The hair loss on the sides of the animal’s neck were present on May 17 and 18, 2021. *Id.* As of the June 2, 2021 inspection, the hair loss had spread to one of the ears. *Id.* A male bobcat “appeared thin and lethargic. He has noticeably lost weight since he was observed on May 18, 2021.” *Id.* at 4. The Lowes presented no documentation that indicated that they had consulted with a veterinarian about either animal’s condition. *Id.*

The inspection also revealed a lack of appropriate food at the facility, signs that animals were not receiving adequate food and water, and no environmental enhancement plan for nonhuman primates approved by an attending veterinarian. *Id.* at 5-6. In the case of the macaques, the APHIS inspectors observed dog kibble contaminated with many flies in their food receptacle and old produce covered in flies in their outside yards. *Id.* “Dog food is not an appropriate diet for nonhuman primates.” *Id.* at 5. The inspectors also noted the “progressively decreasing body conditions” of the bobcats, wolves, foxes, and Canada lynx. *Id.* at 8. These observations reveal that animals at the Thackerville facility are in need of veterinary care and routine visits from an attending veterinarian to ensure that they do not needlessly suffer.

B. Defendants continue to obtain and dispose of animals without conferring with the United States or seeking leave of Court.

Defendants continue to violate the Court’s orders requiring them to confer with the United States and seek leave of the Court before acquiring or disposing of any animals protected under the Endangered Species Act (“ESA”) or AWA. *See* Dkt. 23 at 2; Dkt. 65 at 34; Dkt. 78 at 10. Acquisition and disposition includes any births and deaths as well as transfers of animals to/from other facilities. *See* Dkt. 78 at 10; 9 C.F.R. § 2.75(b)(1). Since the May 12, 2021 show cause hearing, the United States has learned of several additional births and dispositions of

animals subject to the Court's orders. On May 20, 2021, one of the Big Cats seized by the United States on May 6, 2021, gave birth to three cubs. *See* Dkt. 100-8. Based on a Big Cat's average gestational period of 109 days, this animal was bred by the Lowes around February 2021, without conferring with the United States or obtaining leave of Court. *See United States v. 21619 Jimbo Road, 21469 Jimbo Road, 21371 Jimbo Road, Thackerville, Oklahoma 73459*, 6:21-mj-00218-SPS, Dkt. 1, Attachment A (Aff. of Dr. Laurie Gage) ¶ 59.

The June 2, 2021 inspection also revealed two new baby raccoons and identified a total of nine animals previously listed on the Lowe's inventories that were missing. *See* Exh. 2 at 4. Regarding the nine missing animals, Lauren Lowe implied that four raccoons had escaped and stated that three sheep, a goat, and an alpaca were given or sold to a local farmer. *Id.*¹ All of these animals were listed on the December 16, 2020 inventory prepared by Defendants and provided to the United States and are covered by the AWA. Dkt. 28-35 (Exh. DD) at 13, 18. Additionally, the goat, alpaca, and three sheep were present at the Thackerville facility on May 17 and 18, 2021. *See* Exh. 1 ¶ 4. Defendants' willingness to transfer five animals, while under a Court order to not "dispose of any animal covered by the ESA or any animal covered by the AWA" absent leave of Court, *see* Dkt. 65 at 34, and *after* being found in contempt, demonstrates their continued willful disregard for the Court's orders. The inspectors also identified a female

¹ The Lowes attempted to justify the transfer of the animals without a court order by claiming that the five animals were owned by Jeff Lowe's son, Taylor Lowe. *See* Exh. 5 at 3. As an initial matter, the December 16, 2020 inventory produced by the Lowes did not identify Taylor Lowe as the owner of any of those animals. In fact, the Lowes specifically identified Jeff Lowe as the owner of the alpaca. Dkt. 28-35 at 13. In any event, it is irrelevant who owns the animals listed on the December 16, 2020 inventory. The Lowes were required to confer with the United States and seek leave of court before transferring any animals listed on that inventory. Dkt. 65 at 34 (prohibiting Defendants, "*including anyone acting, directly or indirectly, through them or on their behalf*," from disposing of any animals covered by the ESA or AWA absent a court order (emphasis added)).

bobcat housed with a male bobcat and suffering from patches of hair loss and exposed reddened skin, which Lauren Lowe stated were from breeding. Exh. 2 at 3. Again, the Lowes did not confer with the United States or obtain leave of the Court prior to the births, breeding, or disposition of any of these animals.

C. Defendants still have not provided counsel for the United States with complete acquisition and disposition records.

Defendants still have not complied with the Court's order requiring them to: (1) produce acquisition and disposition records for all animals added to or missing from their inventories since June 22, 2020; and (2) produce acquisition and disposition records within seven days of any change to the December 16, 2020 inventory, including the birth or death of any animal. *See* Dkt. 65 at 33-34.

Following the May 12, 2021 show cause hearing, Defendants sent copies of some records via email to counsel for the United States. *See* Dkt. 95. A number of the records were the same ones that the Court already determined were deficient. *See* Dkt. 95-2 at 3-6, 8. Defendants also submitted a chart listing animal births, as well as one new acquisition record. *Id.* In an email response on May 19, 2021, counsel for the United States explained to counsel for Defendants how the records were legally insufficient and incomplete. *See* Exh. 4 (May 19, 2021 Email Between Counsel). Since that email, Defendants have not cured any of the identified deficiencies. The only additional record provided by Defendants is a disposition record for the recently transferred five animals, which was provided only after counsel for the United States informed counsel for Defendants that those animals were missing during the June 2, 2021 inspection. Exh. 5 (disposition record for five animals from Jeff Lowe to his son, Taylor Lowe). Setting aside that the Lowes had no authority to transfer those animals in the first place, the

record provided fails to contain the necessary information required for transfers involving individuals who are not licensed under the AWA. *See* 9 C.F.R. § 2.75(b)(1).

In addition to the record issues previously identified in our filings, the birth chart provided by Lauren Lowe does not meet the regulatory requirements for acquisition or disposition records under the AWA. Moreover, the chart is missing many animals, including offspring identified on the December 16, 2020 inventory, such as Daniel, as well as those offspring who either died or were transferred by the Defendants or their agents and, thus, were not identified on the December 16, 2020 inventory.² Finally, from the chart the United States has now identified additional discrepancies in Defendants' paperwork. The chart states that Wendy, Rita and Legacy are offspring of Phenix and Stalker. Dkt. 95 at 2. However, the December 16, 2020 inventory provides that they are the offspring of Sebastian and Priscilla. Dkt. 28-35 at 15. The chart lists Alyssa as the offspring of Simba and Unicara. Dkt. Dkt. 95 at 2. However, the December 16, 2020 inventory states that she is the offspring of Simba and Manie. Dkt. 28-35 at 6.

Lauren Lowe provided some explanation for other discrepancies in their records; however, those explanations are inconsistent with the available evidence. For example, during the June 2020 inspection, APHIS inspectors observed twelve wolves/hybrids. Dkt. 28-15 (Exh. J) at 8. When the Lowes produced an inventory in August 2020, they likewise identified twelve wolves/hybrids. Dkt. 28-27 (Exh. V) at 7-8. All of those animals had names. *Id.* Defendants concede that eleven wolves/hybrids were transferred to Pat Craig at the beginning of October 2020. Dkt. 72-6 (Exh. EEE) at 3. On the disposition record provided, three of the eleven wolves

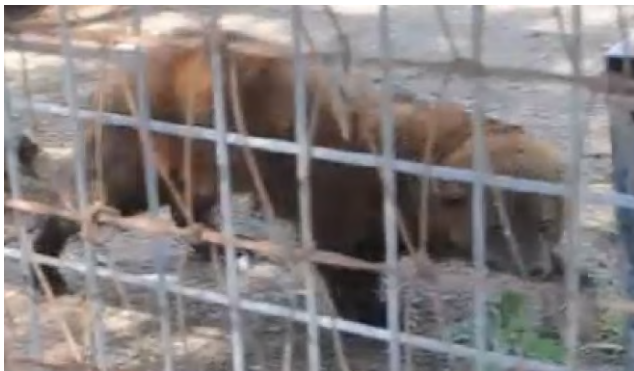
² Healthy Big Cats have litters of between 2 and 7 cubs with 3-4 cubs being the average. Dkt. 72-2 (Exh. AAA) ¶ 3. Defendants need to identify all cubs born, not just those that are on their inventory or for whom we have documentation.

had “no name.” Dkt. 95-2 at 12. With eleven transferred to Pat Craig in October, that should leave one wolf/hybrid at the facility. However, during the December 15, 2020 inspection, APHIS inspectors observed four wolves/hybrids, which were then listed on the inventory produced by Defendants on December 16, 2020. Dkt. 28-33 (Exh. BB) at 11; Dkt. 28-35 at 8. Thus, there were three additional wolves/hybrids at the property but no acquisition record provided.

Regarding Lauren Lowe’s response to the record issue related to the fisher/fishing cat, the United States agrees that a fishing cat and fisher are two different species. (*See below* photos of



fishing cat and fisher, respectively).



However, contrary to Lauren Lowe’s assertions, the Lowes do not currently have in their possession a fishing cat; they have a fisher. *Contra* Dkt. 95 at 1. The report for the June 22, 2020 inspection contained a video of the fisher. *See* Dkt. 28-15 at 41 (*see* photo

from video above); *see also* Dkt. 28. If the Lowes had a fishing cat, as Lauren Lowe insists, then they need to produce a record for the animal because APHIS inspectors have not observed this animal at the Thackerville facility. Further, as detailed in the previous section, the United States has recently learned that two raccoons were born, four raccoons went missing, and five animals

listed on the December 16, 2020 inventory have been sold, but Defendants failed to submit within seven days complete acquisition or disposition records for these animals. Their failure to comply with this requirement calls into question whether additional changes in their inventory, such as other potential births, have been documented and such documentation has been provided to the United States.

In sum, as of the date of this filing, there are still missing acquisition and disposition records, records which do not comply with the regulatory requirements, and inaccurate information evident due to unexplained inconsistencies between different documents. Defendants must account for the whereabouts of their animals to come into compliance with the Court's orders.

II. Request for Relief

Defendants have once again defied the Court's deadline to come into compliance with its previous orders. Because Defendants have failed to comply with the Court's orders and have, in fact, committed additional infractions—including disposing of animals without a court order—the Court should consider other remedies to compel compliance, including potentially jail time. *See* Exh. 6 at 14:22-23 (“The Court could imprison the defendants until they get themselves in compliance”); Dkt. 97 at 3 (“courts have power to punish by fine or imprisonment, or both, at its discretion, such contempt of its authority, and none other, as disobedience or resistance to its lawful writ, process, order, rule, decree, or command”) (citing 18 U.S.C. § 401(3)) (internal quotation marks omitted); *see also United States v. Ford*, 514 F.3d 1047, 1051-53 (10th Cir. 2008) (affirming the district court's finding that imprisonment was the appropriate remedy for defendants' civil contempt and noting that defendant “holds the proverbial keys to the prison doors” and that “[h]e himself can choose to end his incarceration at any point in time, simply by

complying with the [government's] requests").³ Further, the Court should order the return of the five animals that Defendants improperly disposed of and permit the United States to file an additional application for damages.⁴

If the Court were amenable, one option to avoid additional sanctions would be for Defendants to voluntarily and permanently surrender the remaining animals in their possession to the United States at which point the United States would identify proper placements for those animals.⁵ Although this would not resolve the records issue, it would address the other very serious violations of the Court's orders and ensure the safety of the animals currently in Defendants' possession. In that case, the United States would withdraw our pending application for damages resulting from Defendants' noncompliance.

³ Such additional sanctions are further supported by the assertions made in the motion to withdraw filed by Defendants' own attorney, in which Mr. Card argues that the Court should grant his motion to withdraw, in part, because the Lowes "persist[] in a course of action involving [his] services that [he] reasonably believes is criminal or fraudulent" and the Lowes have "used [his] services to perpetrate a crime or fraud." *See* Dkt. 102 at 1, pt. 4 ("Further, for *all reasons* enumerated by Rule 1.16(b)(1)-(6), the precise nature of which cannot be divulged upon counsel from the OBA, counsel seeks to withdraw." (emphasis added)).

⁴ Upon learning that Defendants had recently (since May 18, 2021) transferred the five animals, the United States requested the immediate return of those animals. To date, Defendants have not confirmed the return of the animals or indicated the steps they are taking to ensure the prompt return of the animals. Exh. 7 (June 14-16, 2021 Email exchange).

⁵ Defendants have informed the United States that a subset of animals currently in Defendants' possession are claimed by two other individuals both of whom have had their AWA licenses terminated or revoked. The United States is not currently in a position to assess the validity of those individuals' claims that they have a continued interest in the animals. However, it is the position of the United States that none of the animals should be returned to those individuals. Thus, if Defendants indicated that they were willing to surrender those animals, we would propose that the Court make an equitable finding that all of the animals be transferred to the United States.

DATED: June 18, 2021

Respectfully Submitted,

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Acting Assistant Attorney General
Environment and Natural Resources Division

/s/ Mary Hollingsworth
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EXHIBIT 1

Decl. Dr. Cynthia Digesualdo

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE, LAUREN LOWE,
GREATER WYNNEWOOD EXOTIC
ANIMAL PARK, LLC, and TIGER
KING, LLC,

Defendants.

Case No. 6:20-cv-423

DECLARATION OF DR. CYNTHIA DIGESUALDO


I, Dr. Cynthia DiGesualdo, do hereby declare that:

1. Since July 2008, I have worked as a veterinary medical officer for the Animal Care Division of U.S. Department of Agriculture's ("USDA") Animal and Plant Health Inspection Service ("APHIS"). I earned my Doctor of Veterinary Medicine from Texas A&M University, College of Veterinary Medicine in 2000. I have over 30 years of experience working in or around the exotic animal industry, either as a zookeeper, an attending veterinarian for a zoological facility, or as a USDA inspector.
2. I have conducted inspections of the facility known as Tiger King Park in Thackerville, Oklahoma ("Thackerville facility") on behalf of APHIS. As relevant here, I conducted inspections of the Thackerville facility on January 20, 2021, February 19, 2021, and June 2, 2021. I was on the property to remove animals January 24, 2021, May 6, 2021, and May 17 and 18, 2021.
3. At the inspection of the Thackerville facility on June 2, 2021, I spoke with Lauren Lowe regarding whether they had an attending veterinarian formally retained. She

- stated that they were still working with Dr. Alyson Fryer. I informed her that my office had received information suggesting that Dr. Fryer was no longer working with them. Ms. Lowe then admitted that Dr. Fryer was no longer working for them and stated that they had not had time to hire a new attending veterinarian.
4. When onsite on May 17 and 18, 2021, I prepared an inventory of the animals located at the Thackerville facility at that time. At the June 2, 2021, inspection, I observed that five animals documented on the inventory for the May 17-18 visit were no longer on the premises. These animals include three sheep, one goat, and one alpaca. The facility representative, Lauren Lowe, informed me that these five animals went to a local farmer. No disposition records were available for the five animals at the time of the inspection.
 5. I have personal knowledge of the animals observed at the facility on May 17-18, 2021. I remember seeing the three sheep, one goat, and one alpaca at the Thackerville facility on those dates.
 6. On May 17-18, 2021, and June 2, 2021, I observed a red fox that, according to the facility's records, has been diagnosed as suffering from chronic medical problems, including prostate cancer and arthritis. I have examined the records on site regarding this red fox. The records indicate his name is "Sweeny."
 7. In my professional opinion and based upon my personal observations, Sweeny appears to be unhealthy and in need of immediate veterinary attention. The facility's records indicate that he has not received any veterinary care since at least May 1, 2021. A red fox with Sweeny's chronic illnesses should be routinely examined by a qualified veterinarian and closely monitored for changes in his condition or new

symptoms. The records I reviewed at the Thackerville facility suggest that Sweeny is not being evaluated or monitored appropriately. Among other things, a full veterinary physical is necessary to adequately assess his condition in order to identify the best options to alleviate his suffering and determine whether the most humane option is euthanasia. The lack of veterinary care puts Sweeny at risk of greater suffering, which could be avoided by proper treatment or, if a veterinarian determines that treatment is no longer able to relieve his suffering, humane euthanasia. In my professional opinion, keeping Sweeny in his current living conditions without routine care from a qualified veterinarian is inhumane.

Under the penalty of perjury, pursuant to 28 U.S.C. § 1746(2), I declare the foregoing is true and correct to the best of my knowledge. Executed in Aledo, TX, on June 17, 2021.

**CYNTHIA
DIGESUALDO**  Digitally signed by CYNTHIA
DIGESUALDO
Date: 2021.06.17 15:11:15 -05'00'

Cynthia DiGesualdo, DVM
USDA APHIS Animal Care
Center for Animal Welfare

EXHIBIT 2

June 9, 2021 Inspection Report



United States Department of Agriculture
Animal and Plant Health Inspection Service

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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: 02-JUN-2021

2.40(a)(2) Repeat

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

The facility representatives do not have an attending veterinarian (AV) employed under formal arrangements. As such, the written program of veterinary care (PVC) from the previous veterinarian is not valid. 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 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.

2.40(b)(2) Direct Repeat

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

One of the ferrets has a large submandibular swelling. The swelling encompasses the entire width of the neck. The facility representative states that they noticed the swelling had started a day ago and they have not yet contacted a veterinarian regarding this problem. There is no mention of this ferret in the daily medical logs.

During this visit one of the white racoons appeared lethargic with an overall unthrifty appearance. Although racoons are nocturnal animals, this animal did not appear as bright and alert as the other racoons in the enclosure. He also seemed

Prepared By: CYNTHIA DIGESUALDO
USDA, APHIS, Animal Care

Date:
09-JUN-2021

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

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Inspection Report

to be isolating himself from the other animals which is not normal for racoons. There were no records indicating that he has been seen by a veterinarian or that the facility representative noticed there was a problem.

An old red fox previously diagnosed with chronic medical conditions continues to receive no veterinary care for these conditions. This animal was examined by a veterinarian on Feb 20, 2021. During that visit the veterinarian tentatively diagnosed prostate cancer and arthritis in the front legs. Instructions to the facility representatives were to "monitor mobility on daily observation report, if improved on Metacam notify veterinarian and may continue to use long term. Monitor for trouble urinating and defecating daily." None of this has been documented in the daily observations. The daily record for this animal states "will allow him to pass away peacefully when it's his time".

The bush baby has an area of hair loss on his right side that has exposed reddened skin. The facility representative has documented this problem along with a decrease in the animal's energy in the daily medical log and has been applying Vaseline and coconut oil to the area of hair loss. According to the facilities' former veterinarian, she was never notified about the bush baby having hair loss or acting lethargic.

The bobcat named Paulina has areas of hair loss on both sides of her neck about 1 by 2 inches in size. These areas of hair loss were also present during the May 17-18, 2021 visit to the property. There is now also a small area of hair loss by the ear with exposed reddened skin. The facility representative states that the hair loss is from breeding (she is housed with a male). The daily medical log states that they have been using "wound coat spray" on her skin. There were no records indicating a veterinarian had been consulted about this animal.

Prepared By: CYNTHIA DIGESUALDO
USDA, APHIS, Animal Care

Date:
09-JUN-2021

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

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Inspection Report

The male bobcat named Paul appeared thin and lethargic. He has noticeably lost weight since he was observed on May 18, 2021. There were no records indicating that he has been seen by a veterinarian or that the facility representative noticed there was a problem.

Failure to provide adequate medical care can result in health issues that cause ongoing pain and suffering. The facility representative must ensure that all animals receive adequate veterinary approved nutritional and medical care at all times as directed by a veterinarian which includes appropriate methods to prevent, control, diagnose and treat diseases and injuries.

2.75(b)(1)

Repeat

Records: Dealers and exhibitors.

Three sheep, 1 goat, and 1 alpaca documented on the inventory at the previous inspection were not on the premises at the time of this inspection. According to the facility representative, they were sold to a local farmer. There are no disposition records available for these 5 animals.

At the time of this inspection the facility had 2 baby white racoons. There were no acquisition records for these baby racoons indicating whether they were born on the premises or acquired somewhere else.

Missing acquisition and disposition records documented on previous inspection reports continue to be unavailable for review.

Acquisition and disposition records, including for domestic farm type animals, are necessary to be able to accurately track animals being used in regulated activities to ensure their legal acquisition, proper care, and humane transportation.

Prepared By: CYNTHIA DIGESUALDO

USDA, APHIS, Animal Care

Date:
09-JUN-2021

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

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Inspection Report

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.

3.81 Repeat
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 as there is no attending veterinarian for the facility. 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.

3.82(a) Feeding.
The food receptacle for both macaques contained what appeared to be dog kibble. The kibble was contaminated with many flies. The facility representative stated that they were out of "monkey biscuits" but that they had been ordered. Dog food is not an appropriate diet for nonhuman primates. The presence of flies indicate contamination and decreases palatability. The facility must ensure that diet for the nonhuman primates be appropriate for the species and be clean, wholesome, and palatable to the animals. To be corrected by: June 11, 2021

3.83 Watering.

Prepared By: CYNTHIA DIGESUALDO
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL
OFFICER

Date:
09-JUN-2021

Received by Title: Facility Representative

Date:
09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

CDIGESUALDO
2016090000625463 Insp_id

Inspection Report

Potable water must be provided in sufficient quantity to every non-human primate housed at the facility.

The water bottle provided to the bush baby was empty at the start of the inspection. When filled, the bush baby drank immediately and eagerly for at least 30 seconds.

The water bottle for one of the marmosets was empty at the time of this inspection.

The water available for one of the macaques did not appear to have been cleaned recently. It was a dirty brown color with pieces of orange peel floating in it.

Lack of potable water can result in dehydration and exacerbation of other medical problems. The facility must ensure that potable water be accessible to the animals as often as necessary for the health and comfort of the animals and that all water receptacles be kept clean and sanitary.

To be corrected by: June 11, 2021

3.84(a)

Cleaning, sanitization, housekeeping, and pest control.

The outside yards of both macaque enclosures needed to be cleaned. Old produce on the ground and in the food containers appeared to have been there for several days. The old food was covered in flies.

Enclosures with dirt floors must be spot-cleaned with sufficient frequency to ensure all animals the freedom to avoid contact with excreta, or as often as necessary to reduce disease hazards, insects, pests, and odors. The excessive number of flies covering the old produce indicates that the enclosures are not being cleaned as often as necessary. To be corrected by: June 11, 2021

3.84(c)

Cleaning, sanitization, housekeeping, and pest control.

Prepared By: CYNTHIA DIGESUALDO
USDA, APHIS, Animal Care

Date:
09-JUN-2021

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
09-JUN-2021



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Animal and Plant Health Inspection Service

CDIGESUALDO
2016090000625463 Insp_id

Inspection Report

There is a bucket with old trash and very dirty water sitting right outside the macaque outdoor cages. This is an attractant for flies, mosquitos, and other pests as well as a breeding ground for bacteria and disease. The facility must ensure that buildings and grounds where housing facilities are located are kept clean so as to facilitate husbandry practices and to reduce or eliminate breeding and living areas for rodents, pests and vermin.

To be corrected by: June 11, 2021

3.84(d)

Cleaning, sanitization, housekeeping, and pest control.

Excessive flies were seen in and around the macaque enclosures. The pest control plan in place is to use bags of water hung in the areas of the animals to control the flies. This is a non-traditional plan and as of the time of inspection, does not appear to be effective. Flies provide an annoyance to the animals and can cause skin lesions. The facility must ensure that a safe and effective program for the control of insects, ectoparasites, avian, and mammalian pest is established and maintained.

To be corrected by: June 11, 2021

3.125(a)

Repeat

Facilities, general.

The dirt under the shelter structure in the fisher enclosure has been dug out, exposing a metal grate. There is a gap between the metal grate and the dirt below and the fisher must sit on the metal grate in order to use the shelter. The gaps in the metal grate could cause entrapment or injury to the animal.

There were nine adult raccoons on the last inspection inventory. During this inspection, there were five adult raccoons observed (plus 2 new baby racoons). When asked about the difference in numbers on the inventory, the facility representative stated that they have had to reinforce the enclosure walls due to raccoon escape. Animals that escape

Prepared By: CYNTHIA DIGESUALDO

USDA, APHIS, Animal Care

Date:

09-JUN-2021

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09-JUN-2021



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Inspection Report

their enclosures are no longer protected and cannot be cared for.

The porcupine pair have been chewing on the plywood floor of their enclosure and the plastic of their house. Neither of these is appropriate for a porcupine to be chewing and ingesting. These materials can cause intestinal impactions or other health concerns.

The facility representative must ensure all housing facilities must be structurally sound and maintained in good repair to protect the animals from injury and to contain the animals.

3.129(a) Repeat Feeding.

There was a limited amount of fresh produce and no food appropriate for the non-domestic cats on the premises at the time of this inspection. There was dry bear, cat, and dog kibble. The facility representative stated that they planned to buy fresh food later that day and that the day of the inspection was a "fasting day" for the non-domestic cats.

This is concerning considering the progressively decreasing body conditions seen in the bobcats, wolves, foxes, and the Canadian Lynx. The facility must ensure that food be wholesome, palatable, and free from contamination and of sufficient quantity and nutritive value to maintain all animals in good health. The diet must be prepared with consideration for the age, species, condition, size, and type of animal.

3.130 Watering.

The water tank for the camel contains brown water. The water is dirty enough that the bottom of the tank cannot be evaluated for sanitation.

Prepared By: CYNTHIA DIGESUALDO
USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL
OFFICER

Date:
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09-JUN-2021



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Inspection Report

Lack of potable water can result in dehydration and exacerbation of other medical problems. The facility must ensure that potable water be accessible to the animals as often as necessary for the health and comfort of the animals and that all water receptacles be kept clean and sanitary.

To be corrected by: June 11, 2021

3.131

Repeat

Sanitation.

Excessive flies were seen throughout the facility, both on the animals and in the environment. Animals were seen “flicking” their ears and heads in an effort to remove the flies. The pest control plan in place is to use bags of water hung in the areas of the animals to control the flies. This is a non-traditional plan and as of the time of inspection, does not appear to be effective. Flies provide an annoyance to the animals and can cause skin lesions and tissue damage. The facility must ensure that a safe and effective program for the control of insects, ectoparasites, and avian and mammalian pest is established and maintained.

To be corrected by: Close of business on delivery day.

3.131(c)

Repeat

Sanitation.

There is discarded animal food and other trash on the property and around the animal areas. Some of the discarded food has been swept out of the animal enclosures and has been left near the animal areas. This is providing an environment that encourages the proliferation of flies. Flies are an annoyance to the animals and can cause skin lesions and tissue damage. The facility must ensure that all buildings and grounds are kept clean to facilitate good husbandry practices and to protect the health of the animals.

To be corrected by: Close of business on delivery day.

Prepared By: CYNTHIA DIGESUALDO

USDA, APHIS, Animal Care

Date:

09-JUN-2021

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:

09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

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2016090000625463 Insp_id

Inspection Report

This inspection was conducted with one of the facility owners.

Additional Inspectors:

MARGARET SHAVER, VETERINARY MEDICAL OFFICER

Prepared By: CYNTHIA DIGESUALDO

USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL
OFFICER

Date:
09-JUN-2021

Received by Title: Facility Representative

Date:
09-JUN-2021



United States Department of Agriculture
Animal and Plant Health Inspection Service

Customer: 332646
Inspection Date: 02-Jun-2021

Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
332646	73-C-0230	002	Jeffrey Lowe- 002	02-JUN-2021

Count	Scientific Name	Common Name
000003	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000011	<i>Lemur catta</i>	RING-TAILED LEMUR
000002	<i>Vulpes vulpes</i>	RED FOX (INCLUDES SILVER FOX & CROSS FOX)
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>Lynx canadensis</i>	CANADIAN LYNX
000001	<i>Potos flavus</i>	KINKAJOU
000004	<i>Mustela putorius furo</i>	DOMESTIC FERRET
000001	<i>Caluromys philander</i>	BARE-TAILED WOOLLY OPOSSUM
000002	<i>Atelerix albiventris</i>	FOUR-TOED HEDGEHOG
000007	<i>Procyon lotor</i>	RACCOON
000001	<i>Saguinus midas</i>	RED-HANDED TAMARIN
000003	<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>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
000001	<i>Martes pennanti</i>	FISHER
000002	<i>Canis lupus familiaris</i>	DOG PUPPY
000001	<i>Canis lupus familiaris</i>	DOG ADULT
000062	Total	



United States Department of Agriculture
Animal and Plant Health Inspection Service

Customer: 332646
Inspection Date: 02-Jun-2021

Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
332646	73-C-0230	002	Jeffrey Lowe- 002	02-JUN-2021

EXHIBIT 3

Records Presented During June 2, 2021
Inspection

VETERINARIAN RECORD

Date: 5/1/21

Animal Name: SWEENEY Species: FOX Age: 10+

Vet on site: YES Time: 1300AM

Staff Name: LAUREN

Description:

SWEENEY'S condition - possible cancer

IS NOW getting to him

Will allow him to pass away peacefully
when its his time

06/02/2021 08:37

VETERINARIAN RECORD

Date: 5/27/21 Animal Name: Cheski Species: Bush Baby Age: ADJ

Vet on site: _____ Time: _____

Staff Name: Jackie

Description: Cheski has bed sore on his
right side and rash above
left eye Applying vaseline every
other day will continue to monitor

app unknown - secondary 10+
not as much energy as he used to have
and to old age

2011 grams immediately
12:30pm - took animal to pump - Vets spirits lifted
will start taking him out soon
Examiner everything 3000s even that
5/27/21 520g 231g V12 V14
5/28/21 510g 211g V13 V15

Medicine: Vaseline barmental

06/02/2021 08:39

VETERINARIAN RECORD

Date: 5/10/21

Animal Name: PAULINA Species: BOB CAT Age: 5+

Vet on site: _____ Time: _____

Staff Name: JORGE

Description:
PAULINA WAS NOTICED HAVING A TINY
SPOT ON HER NECK
WILL CONTINUE TO PUT WOUND COAT SPRAY
2x a day.

Medicine: _____

06/02/2021 08:40

EXHIBIT 4

May 19, 2021 Email Between Counsel

From: [Hollingsworth, Mary \(ENRD\)](#)
To: [Daniel Card](#)
Cc: [Strippoli, Briana \(ENRD\)](#)
Subject: Compliance with court orders
Date: Wednesday, May 19, 2021 10:04:00 PM

Mr. Card,

We are responding to your client's May 12, 2021 email regarding acquisition and disposition records. Each animal that has been born to animals at the Lowes' facilities or has been transferred to the Lowes must be accounted for in an acquisition record. Any animal who has died or been transferred from either facility must be accounted for in a disposition record. In some cases, the same animal will have 2 forms, an acquisition form for birth/transfer and a disposition form for death/transfer (*see, e.g.*, Daniel). As we noted in our January 24 & 25, 2021 emails, and the government's motion to enforce, the AWA regulations require the following information to be included in the records:

- the name and address of the person from whom the animal was acquired, or to whom the animal was sold or given;
- the AWA license or registration number of that person;
- if the person is not licensed or registered under the AWA, the document must include the vehicle license number and State and driver's license number and State for the person; and
- the date of acquisition/disposition of the animal.

For acquisition forms reflecting the birth of an animal, the record must accurately identify the parents. The documents that your client provided in the May 12, 2021 email are deficient in a number of ways. First, there are still many missing records. Second, many of the records received still do not comply with the regulatory requirements described above. For instance, the chart is not an acquisition record. Moreover, the chart shows additional discrepancies when compared to the December 16, 2020 inventory.

Once we have received accurate, complete, and corrected documents, we will promptly notify you. In addition, we would like to remind your clients that they must still comply with the requirement that they employ a veterinarian who meets the requirements set forth in 9 C.F.R. § 1.1 and produce a written program of veterinary care that complies with 9 C.F.R. § 2.40(b).

Regards,

Mary Hollingsworth
Senior Trial Attorney
Wildlife & Marine Resources Section
Environment & Natural Resources Division
United States Department of Justice
999 18th Street, South Terrace, Suite 354
Denver, CO 80202
(303) 844-1898

EXHIBIT 5

Disposition Record For Alpaca, Goat and Sheep

From: [Daniel Card](#)
To: [Hollingsworth, Mary \(ENRD\)](#)
Subject: Lowe disposition form
Date: Thursday, June 10, 2021 6:30:12 PM

For the 5 animals.

Get [Outlook for Android](#)

From: Daniel Card <dan@cardlawok.com>
Sent: Thursday, June 10, 2021 3:58:37 PM
To: Daniel Card <dan@cardlawok.com>
Subject: Photo from Dan Card



Get [Outlook for Android](#)

FROM:

JEFF LOWE

21409 Jimmood Rd.

Truckerville, OK 73459

TO:

Taylor Lowe

21409 Jimmood Rd

Truckerville, OK 73459

Alpacas

3 SNEEP

Goat

Return back
to owner.

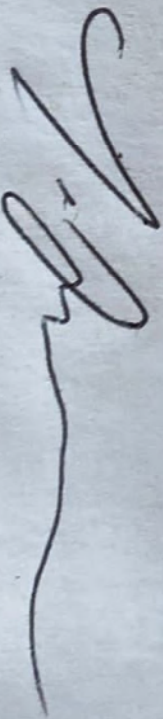


EXHIBIT 6

Partial Transcript for May 12, 2021

Show Cause Hearing

1 THE COURT: Well, the Court's not going
2 to make a decision based upon the notice of
3 non-compliance filed yesterday.

4 The Court is going to make a decision
5 based on the first notice because the defendant
6 had sufficient time to respond to that and, as I
7 stated earlier, did not respond.

8 And the Court's position is those facts
9 as set forth in the previous notice are deemed
10 confessed and the Court does find by clear and
11 convincing evidence that the defendants have
12 violated the Court's order and that a contempt
13 sanction is warranted.

14 The issue now before the Court is what
15 is the remedy? The Court has before it a number
16 of different remedies.

17 Number one, the Court could find the
18 defendants in contempt, as it's doing, and issue
19 a prospective conditional fine until the
20 defendants get themselves in compliance with the
21 order.

22 The Court could imprison the defendants
23 until they get themselves in compliance.

24 The Court could order damages be awarded
25 to the government with respect to any actual

1 damages suffered by defendants' failure to comply
2 with the court order.

3 Does the government wish to be heard
4 concerning the options of sanctions that the
5 Court may consider?

6 MS. STRIPPOLI: Yes, your Honor. We
7 would just like to defer to the Court in its
8 remedy, but we would like to propose that the
9 Court impose a certain course of sanctions for
10 each day the defendants remain out of compliance.
11 We will, of course, defer to the Court as to that
12 amount. But taking into account the amount of
13 defendants' financial resources, we would note
14 that defendants represent that they have
15 significant financial resources.

16 On August 18, 2020, in a Facebook post
17 they have said, quote, "We have millions upon
18 millions of dollars in licensing deals that will
19 pay for anything." This was corroborated by
20 Mr. Card at the January 8, 2021, hearing
21 representing that the defendants have licensing
22 deals that provide them with revenue and the
23 financial ability to care for the animals in
24 their custody.

25 And as recently as April 17, 2021, in an

1 point in time, the Court will consider additional
2 sanctions if the defendants are not in
3 compliance.

4 Is there anything further on behalf of
5 the government?

6 MS. HOLLINGSWORTH: Yes, your Honor. We
7 would like to add a few points.

8 First, I'm not sure if Mr. Card is aware
9 of this but we received an email through USDA
10 from Dr. Friar, the veterinarian that the Lowes
11 have employed, setting aside the issue of whether
12 or not she was qualified in the first place, she
13 has notified us that she intends to give notice
14 to the Lowes because they have apparently failed
15 to pay their veterinary bill. She said she would
16 do that by the end of the month.

17 So again setting aside the issue of
18 whether or not she is qualified in the first
19 place and whether or not the program of
20 veterinary care that they submitted complies with
21 the regs, which have already been determined that
22 they did not, it appears to us that within a few
23 weeks they're going to have no veterinarian on
24 the property, which brings us back to the
25 original issue. We would ask that the Court

EXHIBIT 7

June 14-16, 2021 Email Exchange Regarding
Missing Animals

From: [Daniel Card](#)
To: [Hollingsworth, Mary \(ENRD\)](#)
Cc: [Strippoli, Briana \(ENRD\)](#)
Subject: Re: Lowe disposition form
Date: Wednesday, June 16, 2021 1:38:53 PM

Mary, I forwarded every email you have sent, Whether the animals are on the property is a fact I'm highly unlikely to learn, let alone confirm, I would again suggest you ask the Lowes, as you are explicitly allowed to.

Thanks,

Dan

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From: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Sent: Monday, June 14, 2021 11:21:14 PM
To: Daniel Card <dan@cardlawok.com>
Cc: Strippoli, Briana (ENRD) <Briana.Strippoli@usdoj.gov>
Subject: RE: Lowe disposition form

Mr. Card,

Would you please confirm that you have communicated to your clients that they need to have the 5 animals listed in the document below returned to the Thackerville property immediately per our June 10, 2021 email? In the alternative, would you please confirm that you have forwarded this email to them. The five animals below were listed on the December 16, 2020 inventory and were subject to the Court's January 15, 2021 order, stating in relevant part:

"Pending resolution of the merits of the United States' claims in the Complaint, Defendants, *including anyone acting, directly or indirectly, through them or on their behalf...* shall not acquire or dispose of any animal covered by the ESA or any animal covered by the AWA, excluding common dogs, cats, hamsters, or rabbits, absent leave of court sought by duly-noticed motion. Prior to seeking leave of court to acquire or dispose of any animal covered by this agreement, Defendants shall meet and confer with the United States pursuant to the Local Rules of the Eastern District of Oklahoma."

We would like written confirmation no later than Wednesday, June 16, 2021, that the animals have been returned to the facility.

Regards,

Mary Hollingsworth
Senior Trial Attorney
Wildlife & Marine Resources Section
Environment & Natural Resources Division
United States Department of Justice
999 18th Street, South Terrace, Suite 354
Denver, CO 80202
(303) 844-1898

From: Daniel Card <dan@cardlawok.com>
Sent: Thursday, June 10, 2021 6:30 PM
To: Hollingsworth, Mary (ENRD) <Mary.Hollingsworth@usdoj.gov>
Subject: Lowe disposition form

For the 5 animals.

Get [Outlook for Android](#)

From: Daniel Card <dan@cardlawok.com>
Sent: Thursday, June 10, 2021 3:58:37 PM
To: Daniel Card <dan@cardlawok.com>
Subject: Photo from Dan Card

FROM:

JEFF LOWE

21409 Jimmood Rd.

Truckerville, OK 73459

TO:

Taylor Lowe

21409 Jimmood Rd

Truckerville, OK 73459

Alpacas

3 SNEEP

Goat

Return back
to owner.

