

Dear Oregon House Judiciary Committee Members,

I support HB 3414.

Travelling animal acts using wild or exotic animals are cruel and inhumane to the animals and should be prohibited in Oregon.

HB 3214 does not apply to facilities that are accredited, certified, or verified by the Association of Zoos and Aquariums (AZA), the World Association of Zoos and Aquariums, or the Global Federation of Animal Sanctuaries, organizations who are recognized for having high standards for earning accreditation and for animal welfare, safety, and protection.

Certain “alternative” organizations offering “accreditation” such as the Zoological Association of America (ZAA) have appeared recently who have extremely weak standards of care, dubious associations and motives, and a documented history of condoning poor practices of safety and animal welfare in their “accredited facilities”. HB 3214 appropriately does not provide exemptions based on the so called “accreditation” offered by the ZAA or other such actors.

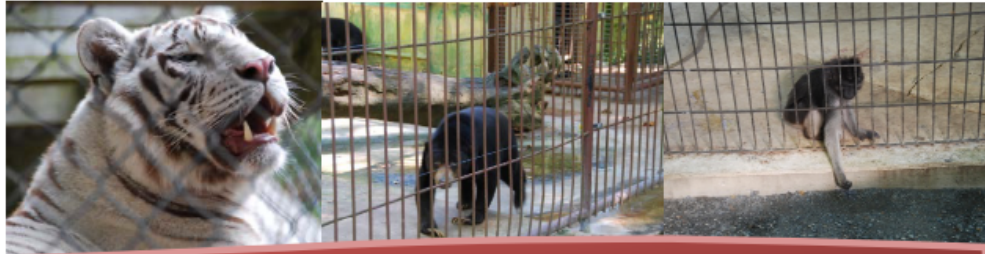
Submitted for your review in the following 14 pages is an excellent information fact sheet about the ZAA and how it compares with AZA standards, provided by the Humane Society of the United States.

Respectfully Yours,

Richard Weber  
Portland, Oregon



THE HUMANE SOCIETY  
OF THE UNITED STATES



# Factsheet

## Exempting the Zoological Association of America (ZAA) severely weakens laws and regulations intended to restrict the private possession of dangerous wild animals to qualified facilities

**In vetoing changes to Michigan’s Large Carnivore Act, Governor Rick Snyder said that expanding permission to ZAA facilities to keep large carnivores in Michigan “could lead to gaps in public health protection and animal welfare.”<sup>1</sup>**

### ZAA’s Exploitation of Tigers

Rampant breeding and exhibition of tigers, particularly white tigers, is popular with ZAA, despite the fact that it serves no conservation purpose and even undermines conservation efforts. White tigers are not a sub-species, but simply an aberrant color variation of Bengal tigers. All captive white tigers are inbred and many suffer serious congenital defects, such as shrunken hearts, kidney ailments, cataracts, club feet, and crippling hip dysplasia. The Association of Zoos and Aquariums (AZA) Tiger Species Survival Plan condemns the breeding of white tigers.

The ZAA also opposes a regulation proposed by the U.S. Fish & Wildlife Service that would provide an important monitoring tool to help prevent captive tigers in the U.S. (estimated to be in the thousands) from fueling the illegal black market for tiger parts.<sup>2</sup> Such opposition demonstrates a callous disregard for conservation and welfare issues.

The deceptively-named Zoological Association of America (ZAA) is a fringe group with weak standards that endorses poorly run roadside zoos, traveling zoos, and private menageries and promotes the private ownership of exotic pets as well as the commercialization of wildlife. Despite threats to public safety and animal welfare, ZAA standards allow public contact with dangerous wild animals. In 2011-2013, The HSUS helped defeat attempts to exempt ZAA facilities from state dangerous wild animal laws in Louisiana, Michigan, and Texas, and similarly played a role in defeating a proposed regulation to exempt ZAA from the California Restricted Species Law.<sup>3,4,5</sup> ZAA has no affiliation with the highly respected Association of Zoos and Aquariums (AZA), which has a long history of setting industry standards for zoological institutions.

### Concerns about ZAA’s facilities, members, and activities include the following, which are detailed in Appendix 1:

- Individuals convicted of felonies, wildlife trafficking, and cruelty to animals
- Animal attacks and escapes
- Allowing the public to have direct and unsafe contact with dangerous wild animals
- Disposing of unwanted wild animals in harmful and irresponsible ways
- Inexperienced staff and insufficient staffing levels
- Numerous USDA fines and official warnings for serious and chronic problems
- Serious welfare concerns found at ZAA facilities include:
  - inadequate veterinary care
  - inadequate feeding
  - filthy drinking water
  - lack of shelter from sunlight and the elements
  - cramped, undersized, and filthy enclosures
  - little to no environmental enrichment
  - depriving newborn bears, big cats, and primates of maternal care
  - subjecting big cats to declawing—a procedure that does not comply with the federal Animal Welfare Act requirements for adequate veterinary care because it causes considerable pain and chronic health problems

### ZAA standards pale in comparison to AZA standards, as detailed in Appendix 2:

ZAA’s vague standards allow conditions that were common at zoos 30 or 40 years ago, but which are totally inconsistent with modern husbandry practices. On the other hand, the AZA has a rigorous and comprehensive accreditation process and the organization has strong standards and policies to address safety, provide for animal health and welfare that greatly exceeds the minimum standards of the federal Animal Welfare Act, ensure fiscal responsibility, and prevent wild animals from entering the pet trade and canned hunting facilities.



## Case Study of a ZAA-Accredited Facility: Catoctin Zoo in Thurmont, Maryland

In September 2013, The HSUS arranged for two captive wildlife experts with more than 80 years of combined experience to visit and evaluate the Catoctin Zoo. The experts observed injured animals, inappropriate mixed-species exhibits, undersized and outdated cages, poorly designed, unhealthy, and potentially unsafe exhibits, filthy cages, drinking water, and food bowls, a lack of enrichment for many species, and enclosures in disrepair. Following are just a few of many problems found at Catoctin Zoo:



A bent, sagging fence next to a tiger cage could easily allow a child to penetrate the public safety barrier.



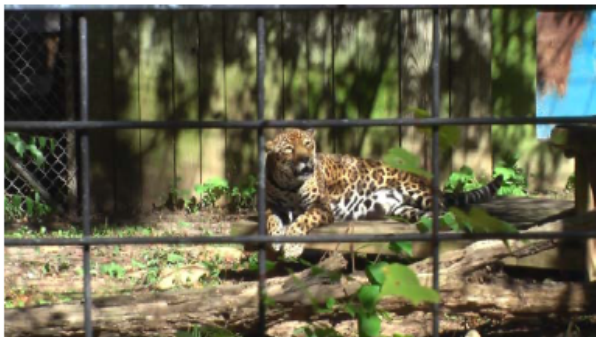
Tigers can jump at least 16-feet vertically, yet this tiger was housed in an enclosure with an estimated 10-foot high fence.



The shockingly inhumane and outdated sun bear cage meets ZAA's inadequate standards. In contrast, the AZA-accredited Oakland Zoo provides its sun bears with 1-acre of natural habitat that allows the bears to climb, dig, bath in a pool, and forage.



There was no evidence of a comprehensive enrichment strategy to promote the psychological well-being of the many primates at Catoctin Zoo, including this young macaque who tried to entertain himself by grabbing a handful of gravel.



This jaguar—one of two that mauled a keeper—is likely able to reach his leg through the wide gaps in the fencing.



This cougar at Catoctin Zoo was euthanized after being attacked by a wolf in an adjacent cage.

## Appendix 1 – Problems with ZAA facilities and members

Detailed concerns about ZAA’s facilities, members, and activities include the following:

### Attacks

- In 2013, a visitor at the Montgomery Zoo\* in Alabama was scratched by a jaguar who was able to reach his paw through the wires of the enclosure.<sup>6</sup>
- In 2009, an inexperienced and unsupervised animal care worker at Catoctin Zoo\* in Maryland was attacked and critically injured by two jaguars.<sup>7,8</sup>
- In 2008, Judy Berens†, owner of Panther Ridge Conservation Center in Florida, was attacked by two cheetahs during a fundraising event and airlifted to a hospital.
- In 2008, Mark McCarthy†, owner of McCarthy’s Wildlife Sanctuary in Florida, suffered bone-deep bite wounds from an adult tiger during a photo shoot for a music video. The tiger began to choke and panicked when a chain tightened around her neck and body.<sup>9,10</sup>
- In 2004, in two separate incidents at Wild Wilderness Safari†, a woman was bitten by a tiger and a worker lost two fingers when she was bitten by a chimpanzee.<sup>11,12</sup>
- In 2002, two workers were attacked by cougars at Wild Wilderness Safari†.<sup>13,14</sup>

### Escapes

- In 2013, a tiger at the Montgomery Zoo\* in Alabama escaped from an enclosure through a break in the fencing and was loose in the adjacent enclosure that housed gazelles and other animals for about 30 minutes.<sup>15</sup>
- In 2012, Wild Wilderness Safari† in Arkansas was cited for the seventh time in about a decade for allowing primates, including macaques, to escape and run loose in the park.<sup>16</sup>
- In 2011, a baboon escaped from Six Flags Great Adventure’s\* drive-through park in New Jersey and was recaptured two days later at a farm 20 miles away.<sup>17,18</sup>
- In 2010, a 500-pound tiger at Jungle Island\* in Florida escaped by jumping over a 14-foot-high fence in pursuit of a primate who had also escaped and was running amok. The tiger came within 10 feet of a 2-year-old toddler and four people were hurt during the chaos.<sup>19,20</sup>
- In 2010, a 100-pound tiger broke through Plexiglas at Tiger World† in North Carolina and passed “just feet” in front of families with young children.<sup>21,22,23</sup>
- In 2008, fifteen patas monkeys escaped from Safari Wilderness Ranch\* in Florida by swimming across a 60-foot-wide moat and then climbing a 28-foot fence. One monkey was shot to death and it took nearly eight months to recapture the rest of them.<sup>24,25</sup>
- In 2008, a spider monkey escaped from Washington Park Zoo\* in Indiana and was found at a nearby boat dealership.<sup>26</sup>
- In 2008, a lion and tiger, both adults, escaped overnight from their cage at Mark McCarthy’s Wildlife Sanctuary† in Florida. Three area schools were placed on lockdown while law enforcement searched for the animals. The big cats were captured the next day.<sup>27,28</sup>
- In 2007, a Syrian brown bear burrowed out of an enclosure and escaped from Safari Niagara\* in Canada, leading authorities on a 14-hour chase through wooded areas.<sup>29</sup>
- In 2003, two Asiatic bears escaped from their enclosure at the Natural Bridge Zoo† in Virginia. The bears broke into a nearby home and nearly attacked the homeowner. Both bears were shot and killed.<sup>30</sup>

### Additional safety concerns

- Oswald’s Bear Ranch\* in Michigan allows members of the public to handle bear cubs weighing up to 90 pounds and was cited by the USDA for using physical abuse to discipline bear cubs being used for photo opportunities with the public as well as allowing children to have unsafe contact with bear cubs.<sup>31,32,33,34</sup>



	<ul style="list-style-type: none"> <li>• Wild Wilderness Safari† was cited by the USDA for repeatedly failing to provide sufficient safety barriers, including for enclosures containing rhinos, hippos, and clouded leopards.<sup>35</sup></li> <li>• Zooworld* was cited by the USDA for: <ul style="list-style-type: none"> <li>○ Insufficient safety barriers that could allow members of the public access to primate and big cat cages.<sup>36,37</sup></li> <li>○ Failure to quarantine a recently acquired wild skunk—a species considered a significant carrier of rabies in the United States. The skunk was kept in the gift shop and taken off-site by a keeper. After one week, the skunk developed symptoms of a neurological illness and was euthanized.<sup>38</sup></li> </ul> </li> <li>• Walking with Lions† in California was cited repeatedly by the USDA for allowing members of the public to have direct contact with big cats.<sup>39</sup></li> <li>• Have Trunk Will Travel* in California was cited by the USDA for unsafe handling of elephants while giving rides to the public.<sup>40</sup></li> <li>• DeYoung Family Zoo† in Michigan was cited by the USDA for having three tiger cages and a cage containing three adult lions that were “not adequate to ensure containment of the animals.”<sup>41</sup></li> </ul>
<p>Declawing big cats</p>	<ul style="list-style-type: none"> <li>• In 2013, Triple D Game Farm* in Montana was cited for declawing a 2-month-old tiger cub.<sup>42</sup></li> <li>• In 2010, Lion Habitat Ranch* in Nevada was cited for declawing two lion cubs.<sup>43</sup></li> <li>• In 2009, Panther Ridge† in Florida was cited for declawing two clouded leopards.<sup>44</sup></li> </ul>
<p>Welfare concerns</p>	<ul style="list-style-type: none"> <li>• In 2013, a 7-month-old lion at Wild Wilderness Safari† in Arkansas was found dead in an enclosure, apparently strangled to death by a collar an employee had left on the lion.<sup>45</sup></li> <li>• In 2013, Zooworld* in Florida was cited by the USDA for:<sup>46</sup> <ul style="list-style-type: none"> <li>○ Staff unilaterally ignoring instructions from the attending veterinarian, including feeding sugary foods to a diabetic tamarin, failing for months to provide supplements to squirrel monkeys suffering from a calcium deficiency, and feeding a lion the morning after anesthesia, which interfered with the veterinarian’s ability to evaluate the lion’s condition.</li> <li>○ inadequate drainage in a lion’s cage that resulted in an anesthetized lion being dropped by staff while wading through knee-deep mud and causing an extremely painful injury that led to the lion’s euthanasia.</li> </ul> </li> </ul>
<p>Insufficient and untrained staff</p>	<ul style="list-style-type: none"> <li>• Hernando Primate* in Florida—which had been cited for filthy cages, enclosures in disrepair, unsanitary food storage, housing together incompatible species, an unsafe lion enclosure, failure to have an environmental enrichment plan for a newly acquired chimpanzee—was cited by the USDA in 2013 for having only one inexperienced employee to care for all the animals at the facility.<sup>47</sup></li> <li>• Catoctin Zoo* in Maryland was cited by the USDA in 2009 for failure to adequately train and appropriately supervise employees after a keeper who had been on the job for only two months was mauled by two jaguars.<sup>48</sup></li> <li>• Citing NGALA’s (a.k.a. Close-up Creatures)* inexperienced staff, the U.S. Fish &amp; Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of big cats in 2010.<sup>49</sup></li> <li>• Following the deaths of approximately 25 animals in a 9-month period at Animal Source Texas‡, the USDA inspector wrote on a 2010 inspection report, “Current animal care personnel do not have experience working with the exotic species brokered through this</li> </ul>

	<p>facility. This could be a contributing factor to the high number of animal deaths this facility has experienced ...”<sup>50</sup></p>
<p>Financial stability and succession planning</p>	<ul style="list-style-type: none"> <li>• The Bucks County Zoo (a.k.a. Animal Junction)* in Pennsylvania was a privately-owned menagerie that consisted of a collection of caged animals—including primates and a tiger cub—displayed inside a warehouse at an industrial park. Just 2½ years after opening, the zoo went out of business in October 2011. It advertised its displaced and deadly reticulated pythons and gaboon viper in <i>Animal Finders’ Guide</i>, a publication that caters to the pet trade (see Appendix 3).<sup>51</sup> After the zoo moved out, the property owner claimed the zoo had caused more than \$100,000 in damage.<sup>52</sup></li> <li>• In 2014, county officials closed Roos-n-More*, a 3-acre zoo with 385 animals in Nevada, after an inspection revealed several violations related to operating a business on residential property. The zoo began soliciting money from the public to raise the more than \$100,000 needed for upgrades in order to re-open.<sup>53</sup></li> <li>• Roo Ranch* in South Dakota, which opened on a whim in 2006 following a trip to Australia, closed after the death of the owner in 2009.<sup>54</sup></li> </ul>
<p>Inadequate space</p>	<ul style="list-style-type: none"> <li>• The Montgomery Zoo* was cited by the USDA in 2012 for failure to provide minimum space to a surplus black bear who was kept in an undersized cage that prevented her from standing upright on her hind legs.<sup>55</sup></li> <li>• Catoctin Zoo* was cited by the USDA in 2007 for failure to provide minimum space to three sun bears kept in an 8.5’ x 8.5’ x 8’ cage in the off-exhibit area.<sup>56</sup></li> <li>• Buddy Jordan’s† NBJ Zoological Park was cited by the USDA in 2013 for failure to provide minimum space to a male gibbon who was housed in a 4’ x 4’ x 4’ cage.<sup>57</sup></li> <li>• Wildlife Wonders* in Georgia has been cited repeatedly by the USDA for failure to provide animals, including a primate, with minimum space as well as filthy, rodent-infested conditions and feeding a diseased goat carcass to wolves.<sup>58,59</sup></li> <li>• Citing Zoo of Acadiana’s* inadequate space and lack of cage furnishings, the U.S. Fish &amp; Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of primates, big cats, and other animals in 2009.<sup>60</sup></li> </ul>
<p>Disposing of animals in harmful and irresponsible ways</p>	<ul style="list-style-type: none"> <li>• William Coburn†, operator of Wild Acres Ranch and Safari Adventures* at Kalahari Resorts in Ohio uses tiger, lion, and bear cubs for public handling and has African lions and black bears slaughtered to sell their meat. Coburn has also been cited by the USDA for numerous serious violations of the Animal Welfare Act.<sup>61,62</sup></li> <li>• ZAA co-founder Jim Fouts was exposed in a <i>60 Minutes</i> piece for selling endangered antelope at an auction where animals may end up at canned hunt facilities.<sup>63</sup></li> <li>• Buddy Jordan† has sold animals to hunting ranches and operators of exotic-animal auctions and is on the board of directors of the Exotic Wildlife Association, a group that advocates for canned hunting of rare and endangered species.<sup>64,65</sup></li> <li>• Zooworld* in Florida placed a “free to good home” classified ad for a 7-year-old cougar in <i>Animal Finders’ Guide</i>, a publication that caters to the exotic pet trade (see Appendix 3).<sup>66</sup></li> <li>• Wildlife World Zoo* in Arizona transferred a tiger cub to a roadside zoo in Pennsylvania and sent five New Guinea singing dogs to a roadside facility in Oklahoma.<sup>67,68</sup> Both facilities had been repeatedly cited by the USDA for failing to provide animals with veterinary care.<sup>69,70</sup></li> <li>• Nevada-based Dirk Arthur† sent three tigers and one leopard to a Colorado roadside zoo with pending USDA charges that include failure to provide adequate veterinary care, improper and unsafe handling, and filthy and deteriorating conditions.<sup>71,72,73</sup></li> <li>• Living Treasures Animal Park† in Pennsylvania sent a 4-week-old tiger to Plumpton Park Zoo</li> </ul>

in Maryland (a facility that has accumulated 109 USDA violations since 2006). The tiger was kept in a keeper's home and died a few months later after ingesting plastic materials and cloth. A necropsy revealed the tiger was anemic, had a heavy flea infestation, and suffered from metabolic bone disease, which is often associated with an improper diet.<sup>74,75</sup>

- Conservators' Center† in North Carolina sent two tigers to an unstable environment at the Baghdad Zoo while Iraq was embroiled in military conflict and many citizens were without access to basic necessities.<sup>76</sup>

### Criminal records

- Mario Tabraue†, owner of Zoological Wildlife Foundation, was released from prison in 2000 after serving just 12 years of a 100-year sentence. Tabraue, described by a federal agent as a "ruthless and violent drug dealer," had been charged in a federal racketeering indictment that included murder, drug trafficking, corruption, and obstruction of justice. Tabraue used a machete and circular saw to cut up the body of a murdered federal informant. Before his arrest, Tabraue used an exotic animal business as a front for his drug trafficking.<sup>77</sup>
- Meghan Mogensen, director of Reston Zoo in Virginia—one of three zoos owned by Eric Mogensen†—pleaded guilty in 2013 to cruelty to animals and was sentenced to one month in jail after she was charged with drowning a sick wallaby and possession of ketamine, a controlled substance.<sup>78,79,80</sup>
- In 2002, Tim Rivers† of Animals in Motion was sentenced to six months in federal prison for selling endangered big cats, including a tiger and leopards, to an animal-killing ring. Rivers, who has admitted to at least nine arrests related to cruelty to animals, toured the country for years with an act that forced a mule to jump from a 30-foot ramp into a pool.<sup>81,82</sup>

### Unprofessional conduct

- Lex Salisbury†, former president of Tampa's Lowry Park Zoo, was forced to resign in 2008 and the zoo temporarily lost its AZA accreditation when an audit concluded that Salisbury owed more than \$200,000 to the city for taking the zoo's animals and equipment to his private ZAA properties, making zoo employees work for his personal ZAA business venture, giving himself an unauthorized bonus, and taking his wife on expensive zoo-funded trips. As of 2013, Salisbury was a member of the ZAA board of directors.<sup>83,84</sup>
- In October 2011, Johnny Martinez†, then ZAA board member and director of the Washington Park Zoo, was suspended by Michigan City, Indiana, officials after he used the zoo for a personal after-hours party during which the doors to the primate house were left open, allowing temperatures to fall into the lower 60s, and party-goers consumed concessions without paying for them and left the grounds littered with trash.<sup>85</sup>
- In 2008, Safari Niagara\* in Canada was fined \$2,000 after pleading guilty to making a false statement to a conservation officer regarding native wildlife kept at the facility.<sup>86</sup>

### USDA Enforcement Actions

- In 2013, the USDA fined Zooworld\* \$1,571 after a 5-month-old giraffe sustained cervical injuries due to unsafe conditions and was euthanized, having an insufficient public safety barrier at the dingo enclosure, a muddy tiger enclosure, and rodent-infested conditions in primate and bear enclosures.<sup>87</sup>
- In 2013, the USDA issued an Official Warning against Capital of Texas Zoo\* for failure to provide veterinary care to underweight animals, repeated failure to maintain facilities in good repair, repeated failure to feed animals an appropriate diet, repeated failure to keep premises clean and in good repair, and inadequate pest control.<sup>88</sup>
- In 2013, the USDA issued an Official Warning against Wildlife World Zoo\* for failure to safely handle a 3-month-old tiger cub brought to a television studio and failure to maintain facilities to protect the animals from injury and contain the animals.<sup>89</sup>
- In 2013, the USDA issued an Official Warning against Susan Bradshaw† of Zooville USA in Florida for repeated failure to provide animals with clean drinking water and remove excess

accumulations of feces from numerous cages.<sup>90</sup>

- In 2013, the USDA issued an Official Warning against Scott Edwards† of Sharkarosa Exotic Park in Texas for failure to provide animals with clean drinking water and repeated failure to maintain the perimeter fence, which may have allowed predators to enter the property and kill numerous animals.<sup>91,92</sup>
- In 2012, Catoctin Wildlife Zoo\* in Maryland, was fined \$12,000 by the USDA to settle charges of repeatedly violating the veterinary care, handling, housing, and husbandry standards of the federal Animal Welfare Act.<sup>93,94</sup>
- In 2012, Animal Source Texas‡ was fined \$59,777 by the USDA to settle charges of repeatedly failing to provide veterinary care, including to animals in obvious distress, and inexperienced staff that may have contributed to the deaths of 25 animals in a 9-month period.<sup>95,96,97</sup>
- In 2012, the USDA issued an Official Warning against Leesburg Animal Park, operated by Shirley Johnson† in Virginia for repeated failure to construct a perimeter fence of sufficient height.<sup>98</sup>
- In 2012, the USDA issued an Official Warning against Jungle Island\* in Florida for failure to construct and maintain cages to safely contain a gibbon and a tiger who had both escaped and failure to have a responsible adult available to conduct an animal welfare inspection.<sup>99</sup>
- In 2011, the USDA fined Panther Ridge, owned by Judy Berens†, \$2,786 for allowing a member of the public to pet a jaguar through its enclosure, resulting in the jaguar biting the woman's thumb.<sup>100</sup>
- In 2011, the USDA fined Tiger World, owned by Lea Jaunakaist†, \$2,571 for a tiger escape.<sup>101</sup>
- In 2010, the USDA issued an Official Warning against Hemker Zoo\* for repeated failure to maintain enclosures in good repair to protect animals from injury and failure to provide animals with shelter from sunlight and inclement weather.<sup>102</sup>
- In a 2009 USDA administrative court proceeding, Mario Tabraue†, owner of Zoological Wildlife Foundation, admitted providing falsified documents and making false statements to the USDA while helping an unlicensed individual acquire a tiger.<sup>103</sup>

\*Currently or recently identified as an accredited facility. Accredited facilities can vote for the Board of Directors.

†Individual, facility owner, or facility representative currently or recently identified as a professional member. Professional members can vote, run for the Board of Directors, and conduct facility inspections. Professional members are sponsored by two individuals and approved by the Board of Directors.

‡Currently or recently identified as a commercial member.



## Appendix 2 – AZA standards versus ZAA standards

Accreditation by the Association of Zoos & Aquariums (AZA) ensures that highly qualified, knowledgeable, and experienced professionals provide care for animals in a safe and secure environment at modern facilities. In contrast, the deceptively-named Zoological Association of America (ZAA) has weak standards, accredits poorly run roadside zoos and private menageries, and promotes the private ownership of exotic pets and the commercialization of wildlife. The chart below illustrates a few important differences between the two organizations.

	AZA	ZAA
<b>Year established</b>	1924 <sup>104</sup>	2005 <sup>105</sup>
<b>Accredited Facilities</b>	223 <sup>106</sup> (primarily city-run zoos or zoos operated by a non-profit zoological society).	52 <sup>107</sup> (primarily privately-owned roadside zoos and menageries).
<b>Mission</b>	“Provides members the services, high standards and best practices needed to be leaders and innovators in animal care, wildlife conservation and science, conservation education, the guest experience, and community engagement.” <sup>108</sup>	One stated purpose of ZAA is to “Protect and defend the right to own exotic and domestic animals, both privately and publicly ...” <sup>109</sup>
<b>Accreditation Application</b>	A comprehensive 29-page document that requires detailed information about the facility’s animals, <sup>110</sup> veterinary care, <sup>111</sup> physical facilities, <sup>112</sup> safety and security, <sup>113</sup> conservation, <sup>114</sup> education, <sup>115</sup> research, <sup>116</sup> governing authority, <sup>117</sup> staff, <sup>118</sup> operating budget and sources of funding, <sup>119</sup> and also requires copies of the facility’s policies, procedures, records, lists, and reports.	A simple 8-page document that requires the candidate to provide basic contact information as well as very minimal information about the facility’s animals, physical site, and programs, only three short questions about safety, as well as a section dedicated to hunting ranches seeking ZAA accreditation. <sup>120</sup>
<b>Insurance</b>	Insurance required covering visitors, staff, volunteers/docents, and physical facilities. <sup>121</sup>	No reference to insurance in its standards or accreditation application.
<b>Fiscal responsibility</b>	Institution must demonstrate financial stability. <sup>122</sup>	No reference to financial stability, operating budgets, or funding sources.
<b>Inspection process</b>	A team of specially-trained inspectors, including at least one veterinarian as well as animal and operations experts spends several days visiting every area of an applicant’s facility, interviewing staff, checking records, reviewing protocols, ensuring financial stability, and examining physical facilities and animals. <sup>123</sup>	A two-member inspection team separately evaluates the facility. One team member may be a local veterinarian <i>chosen by the applicant</i> . <sup>124</sup>
<b>Safety and security for potentially dangerous large carnivores, large reptiles, medium to large primates, and large hoofstock</b>	<ul style="list-style-type: none"> <li>Alarm systems in place for animals posing serious threat of catastrophic injury and/or death.<sup>125</sup></li> <li>Protocols and procedures in place to notify staff in the event of a bite injury, attack, or escape.</li> <li>Conducts routine emergency drills to insure procedures are followed in the event of an attack or escape.</li> <li>Submits a written report to AZA within 30 days of an escape or serious injury, detailing the incident and describing actions taken by the facility, and may result in a special inspection.<sup>126</sup></li> </ul>	The new 2014 animal care standards (although copied in part from AZA) do not specifically include safety standards for inherently dangerous large carnivores, large reptiles, medium to large primates, or large hoofstock, contain a simple 1-page risk management section with few details, and has no requirement to notify ZAA of attacks or escapes.
<b>Public handling of big cat cubs, bear cubs, and primates</b>	Largely supports a proposal under consideration by the U.S. Department of Agriculture to ban public handling of big cats, bears, and primates under the federal Animal Welfare Act.	At least a dozen ZAA facilities and members offer public handling of big cat cubs, bear cubs, and/or primates.

	<b>AZA</b>	<b>ZAA</b>
<b>Zoonotic diseases</b>	Detailed information regarding zoonotic diseases, preventive measures, staff training, the use of personal protective equipment, and quarantine areas in compliance with standards developed by the American Association of Zoo Veterinarians. <sup>127</sup>	One sentence about minimizing zoonotic disease risks during quarantine of fish and one sentence about “sanitary precautions” for wildlife used in public contact.
<b>Safety committee</b>	22-member Safety Committee disseminates best practices, recommends changes in best practices and professional training, and addresses emerging safety issues. <sup>128</sup>	No safety committee.
<b>Security</b>	Security on a 24-hour, year-round basis. <sup>129</sup>	No requirement for 24-hour security. <sup>130</sup>
<b>Controlled substances</b>	Written, formal procedures must be available to the animal care staff for the use of animal drugs for veterinary purposes and appropriate security of the drugs must be provided. <sup>131</sup>	No references to use or secure storage of controlled substances.
<b>Exotic Pets</b>	Policy recognizing that wild animals do not make good pets. <sup>132</sup>	ZAA defends the right for individuals to own exotic animals and accredited facilities and members breed and sell a variety of wild animals to the public. <sup>133,134,135</sup>
<b>Sample animal disposition policies (primates, auctions, and hunting)</b>	<p>Primates may not be sold, traded, or given to individuals or to animal dealers known to place primates with individuals.<sup>136</sup></p> <p>Non-domesticated animals shall not be disposed of at animal auctions or to any organization or individual that may use or sell the animal at an animal auction, and animals shall not be disposed of to organizations or individuals that allow the hunting of these animals or their offspring.<sup>137</sup></p>	<p>Members sell primates to pet monkey dealers.<sup>138,139,140,141,142,143</sup></p> <p>No policy against hunting zoo animals or selling them at auctions. Evidence of facilities selling wild animals at auction, to hunting ranches, to exotic-animal breeders and dealers, as well as slaughtering African lions and black bears, once used for public handling, for the sale of their meat.<sup>144,145,146</sup></p>
<b>Illegal trade in tiger parts</b>	Supports proposed federal regulations to help prevent captive tigers in the U.S. from fueling the illegal black market for tiger parts by monitoring breeding and disposition. <sup>147</sup>	Opposes proposed federal regulations to help prevent captive tigers in the U.S. from fueling the illegal black market for tiger parts by monitoring breeding and disposition. <sup>148</sup>
<b>Animal welfare</b>	<ul style="list-style-type: none"> <li>Facilities provide species-specific behavioral enrichment and husbandry that greatly exceed the minimum standards of federal law.<sup>149</sup></li> <li>16-member Animal Health Committee ensures high quality and comprehensive animal health care.<sup>150</sup></li> <li>31-member Animal Welfare Committee develops assessment tools and drives the creation of detailed, species-specific animal care manuals.<sup>151</sup></li> <li>Veterinary coverage must be available to the animals 24 hours a day, 7 days a week.<sup>152</sup></li> <li>Keepers trained to recognize abnormal behavior and clinical symptoms of illness and dietary and husbandry requirements.<sup>153</sup></li> <li>Necropsies performed on deceased animals to determine if the cause of death may be related to nutritional status or other aspects of husbandry.<sup>154</sup></li> </ul>	There is no reference to routine veterinary care requirements or species-specific animal care manuals, references to psychological well-being of animals are few and vague, dietary and husbandry standards are very brief and lacking in detail, and there is no mention of conducting necropsies to determine what caused the death of an animal. <sup>155,156</sup>

	<b>AZA</b>	<b>ZAA</b>
<b>Open door policy</b>	Institutions must develop a clear process for identifying, communicating, and addressing animal welfare concerns within the institution in a timely manner, and without retribution. <sup>157</sup>	No policy for staff to communicate animal welfare concerns.
<b>Sample caging requirements (chimpanzees and tigers)</b>	<p>2,000-square-feet of indoor and outdoor space and useable vertical heights of over 20 feet for chimpanzees.<sup>158</sup></p> <p>A minimum of 1,206-square-feet per enclosure, with 50 percent more floor space added for each additional tiger; walls, if used, must be 16-feet high, and tigers must be provided with a pool large enough for swimming.<sup>159</sup></p>	<p>240-square-feet and 8 feet of vertical height for chimpanzees<sup>160</sup></p> <p>360-square-feet for up to two tigers with 25 percent more floor space for additional tigers, a 14-foot high fence in uncovered outdoor exhibits, and no requirement for a pool.<sup>161</sup></p>



## Appendix 3 – Animal Finders’ Guide

*Animal Finders’ Guide* is a trade publication that peddles exotic animals to breeders, dealers, hunting ranches, and the pet trade. In an apparent response to criticism, ZAA no longer publicly identifies *Animal Finders’ Guide* as an affiliate, but it is clear the two organizations maintain a close relationship. ZAA’s display ad routinely appears among *Animal Finders’ Guide*’s monthly classifieds that offer innumerable species—including big cats, bears, primates and wolves—for sale or “free to good home,” and *Animal Finders’ Guide* continues to run a display ad in ZAA’s newsletter. Following are examples of ads commonly seen in *Animal Finders’ Guide*. No reputable facility would dispose of dangerous wild animals through classified advertisements.

**Spider monkey** – eight year old male, easily handled by men, fully intact, \$4500. **White tiger**, eleven month old female, well socialized, \$4500. **Umbrella cockatoo**, twenty-one year old female, great bird, prefers men, easily handled, \$500. **Dwarf horse**, fourteen month old gray mare, 22’ tall, \$800. Partial trades considered. 740-710-1693. OH 9-1-11

**TIGER cub** – five month old female, well socialized, \$500. 740-596-0543. OH 4-1-11

**Free** – cinnamon black bear male approximately 500 pounds, out pet, must go to a good home. Please call Brian at 715-571-6752. WI 7-1-11

**Free to good home** – male hetero tiger, two years old, very nice disposition, you must have proper permits in your area. E-mail for photos or more information at SSMadly@aol.com or call 979-535-4335. TX 1-1-06

**FOR SALE:** male Hamadryas baboon, three years old, hand raised, what a show off; female Hamadryas baboon, two years old, hand raised; male vervet monkey, six years old, very nice; female vervet, four years old; male snow macaque, ten years old. Interested parties only. 563-285-4185. IA 6-1-11

North American black bears: one 3 year old, one 4 year old, good breeders, great bloodlines, free. 518-642-3206. NY 10-15-07

**Male spider monkeys** – both must go together. Do not have the space for winter, proper permits required. 540-858-3610. VA 10-1-11

Cinnamon black bear male, about 500 pounds, 15 years old, must move, make offer. Also heavy duty bear pen 12’x20’x8’ high. Asking \$2500. 715-257-9302 or cell 715-571-6752. WI 6-1-11

White tigers due in June, \$8000. For more information call 979-535-4335. TX 6-1-11

Male snow macaque, 2 years old, bottle raised, tame, intact, \$1800. 816-517-2254. MO 7-1-11

**Nine year old black bear free to good home, need USDA license. 618-372-8549. IL 10-1-11**

1.1 white tigers born 4-23-06, perfect; 4 coatimundi females, proven breeders, \$300 each; 1.1 liontail macaque breeder pair, \$12,500 (Kansas only); female black leopard, two years old, \$1800; spotted female, one year old \$1800; one male olive baboon born 3-23-08, \$3000; one male olive baboon, seven years old, \$1500; female tiger breeders, \$1000. Call Tom 620-515-2885. KS 6-1-08

For sale: twelve week old Syrian cubs, one male, one female, bottle fed and handled by hundreds of people. 419-234-0388. OH 5-1-11

Looking to place **male chimps** to a licensed home. They are same bloodline as our main breeder. 661-245-2406. CA 6-1-05

**Tiger cub male, four months old, proper licenses and permits required. arkexotics@yahoo.com 567-395-1435. 12-1-11**

**Free tigers** – five females, one male. All are hetero, ages vary from fifteen months to twenty months. 812-256-3894, ask for Tim. Southern Indiana 7-1-06

Adults – 2.2 tigers, hetero and white; female lion; 1.1 leopards, black and spotted; 1.1 cougars; 2 male bobcats; 1.1 raccoon; 1.4 skunks; female serval; 1.2 coyotes; 1.1 wolves. Walk-in freezer, 10” meat grinder. 740-763-0640. OH 10-15-05

Free to good home: 1.1 adult tigers, good temperament; 0.1 adult black leopard, Location Oklahoma. Questions, 580-677-0443. OK 6-1-11

SIBERIAN tigers looking for a good home, four years old and older. Contact Maria at Silver Wolf Animal Refuge, 830-743-1693 in Sequin, TX 5-1-11

Free to good home: three year old friendly female cinnamon black bear. 440-563-9401. OH 1-1-07

**FREE to approved home: female tiliger, turned three in July 2011, awesome looking cat, green eyes. Also have a pair of lions: male eight years old, proven breeder, real nice looking cat; female lion turned three in July 2011. Older female bobcat, good health and looks good. For more information call 979-535-4335. TX 11-1-11**

**Free:** young hetero tigers, males and females. To be placed in good home. 979-779-7230. TX 8-15-06

**Free black bears, bottle fed, gentle** – two males born 2002; one female, one male born 2004. For more information call 828-497-9191. NC 6-1-09

Free beautiful tigers, must reduce inventory – three males born in 2003, one male born in 2001, one female born in 2003 who has same father as the three other males. USDA. Phone 580-875-3968, cell 580-351-8642. OK 9-15-05

Free to a good home: one male, one female black bears. Interested parties call 641-324-9974 for more information. Iowa 6-1-09

**FREE:** one female lion, 4 months; one male tiger, 4½ months; 2½ year female tiger. Good dispositions and well socialized. 309-783-2112. IL 1-1-08

Zoological Association of America **ZAA**  
P.O. Box 511275  
Punta Gorda, FL 33951  
941-621-2021  
www.zaa.org • info@zaa.org

**Free:** three female adult black bears, tame. 507-213-7669. MN 6-1-11

**COUGAR free to good home, seven years old, beautiful animal. Email: zooworld@knology.net FL 2-1-12**

Gibbons – white handed fawn male, black female, five years old. Red ruffed lemurs, breeder pair. Virginia or proper permits only. 804-405-2061. VA 10-1-11

**Free** – eight year old black bear, used in exhibit, to a good home only. 419-234-0388. OH 6-1-09

Nine week old black bear cubs, two females, \$500 each. You may pick up or pay for shipping. Baby tiger cubs on the ground, ready to go in mid to end of June, will be eleven weeks old. Males and females from great bloodline. Good looking cats. References available. 405-207-1168. Oklahoma 9-1-08

**Black bear cubs** available in February and March. 678-859-6820. GA 8-15-06

Tiger cub female, six weeks old, bottle raised, started on leash, does educational lectures, well mannered. Call Kathy, 603-878-2255. NH 6-1-05

**Wanted: baby chimps, 1-4 months old, males or females.** Only reasonable prices considered. USDA & USDI licensed. 979-779-7230. TX 11-1-07

**African lion cubs**, six weeks old, very sweet, house raised, still on bottle, \$1500. 225-405-3158 or 225-791-5984. LA 10-15-05

- <sup>1</sup> Paul Egan, "Michigan bear cub legislation could be back for debate," *Detroit Free Press*, December 31, 2012.
- <sup>2</sup> Jim Fouts, chairman of ZAA, letter to Tim Van Norman at U.S. Fish and Wildlife Service, "RE: U.S. Captive-Bred Inter-Subspecific Crossed or Generic Tigers, RIN 1018-AW81; Docket Number FWS-R9-IA-2011;96300-1671-0000-R4," October 5, 2011.
- <sup>3</sup> Regular Session, 2012, Senate Concurrent Resolution No. 16, Senator Cortez, Original
- <sup>4</sup> Regular Session, 2012, Senate Concurrent Resolution No. 16, Senator Cortez, Engrossed
- <sup>5</sup> Paul Egan, "Michigan bear cub legislation could be back for debate," *Detroit Free Press*, December 31, 2012.
- <sup>6</sup> U.S. Department of Agriculture, Inspection Report, Montgomery Zoo, 64-C-0003, May 22, 2013.
- <sup>7</sup> "2 jaguars in quarantine after one attacks zoo worker," Associated Press, January 20, 2009.
- <sup>8</sup> U.S. Department of Agriculture, Inspection Report, Catocin Wildlife Preserve, 51-C-0034, January 30, 2009.
- <sup>9</sup> Rochelle E.B. Gilken, "Tiger bites Loxahatchee wildlife trainer during rapper's video shoot," *Palm Beach Post*, May 13, 2008.
- <sup>10</sup> "Trainer recovering after tiger bites him at rap video shoot," *Miami Herald*, May 14, 2008.
- <sup>11</sup> "Woman is injured by tiger in Gentry," *Benton County Daily Record*, November 10, 2004.
- <sup>12</sup> Tracy M. Neal, "Woman sues after monkey bites off fingers," *Benton County Daily Record*, January 28, 2005.
- <sup>13</sup> "On the prowl," *Arkansas Democrat Gazette*, April 7, 2002.
- <sup>14</sup> "Two injured in attack in drive-through safari," Associated Press, January 28, 2002.
- <sup>15</sup> "Tiger briefly escapes enclosure at Montgomery Zoo," Associated Press, December 12, 2013.
- <sup>16</sup> U.S. Department of Agriculture, Inspection Report, Wild Wilderness, 71-C-0151 and 71-C-0004, January 23, 2012, February 8, 2005, November 23, 2004, April 6, 2004, April 11, 2003, January 14, 2003, October 30, 2001.
- <sup>17</sup> "Captured baboon belongs to Great Adventure safari, park officials say," *Star-Ledger*, July 2, 2011.
- <sup>18</sup> "Escaped baboon, spotted in Jackson and Freehold, remains missing," *Star-Ledger*, July 1, 2011.
- <sup>19</sup> Laura Figueroa and Christine Dolen, "Small ape triggered tiger escape at Jungle Island," *Miami Herald*, August 30, 2010.
- <sup>20</sup> "Toddler comes face to face with escaped Bengal tiger in Miami Zoo," *Daily Mail*, September 1, 2010.
- <sup>21</sup> "Tiger Cub Gets Out Of Cage During Training Exercise," WSOC-TV, April 23, 2010.
- <sup>22</sup> "Parents Release Photo After Tiger Breaks Out of Cage," WSOC-TV, April 26, 2010.
- <sup>23</sup> U.S. Department of Agriculture, Settlement Agreement, Case #NC10052-AC, February 20, 2011.
- <sup>24</sup> Keith Morelli, "Chopper Pilot Spots Escaped Monkeys Under Tree In Polk," *Tampa Tribune*, April 21, 2008.
- <sup>25</sup> "Last five of Salisbury's missing monkeys found," *Tampa Bay Times*, December 18, 2008.
- <sup>26</sup> "Monkey uses garden hose to scale moat, bolt from zoo," Associated Press, June 13, 2008.
- <sup>27</sup> "Tiger captured after escape from Fla. sanctuary," Associated Press, August 20, 2008.
- <sup>28</sup> Jerome Burdi and Peter Franceschina, "Missing tiger, lion found at McCarthy's in western Palm Beach County," *Sun-Sentinel*, August 20, 2008.
- <sup>29</sup> "No charges over bear's escape from zoo," *Toronto Star*, August 24, 2007.
- <sup>30</sup> Annie Gowen, "Va. Zoo Probed After Rare Bears Escape-Animals Were Shot to Death; Activists Seek Closing of Rockbridge County Facility," *Washington Post*, December 31, 2003.
- <sup>31</sup> U.S. Department of Agriculture, Inspection Report, Oswald's Bear Ranch, 34-C-0123, June 18, 2013.
- <sup>32</sup> Dustin Bonk, "Un-BEAR-able act amended," WLUC TV6, April 1, 2013.
- <sup>33</sup> U.S. Department of Agriculture, Inspection Report, Oswald's Bear Ranch, 34-C-0123, November 9, 2010.
- <sup>34</sup> Garret Mathews, "Tender moment with cuddly cub almost unbearable," *Evansville Courier & Press*, July 20, 2005.
- <sup>35</sup> U.S. Department of Agriculture, Inspection Report, Wild Wilderness, 71-C-0151, September 1, 2010.
- <sup>36</sup> U.S. Department of Agriculture, Inspection Report, Zooworld Zoological, 58-C-0460, October 3, 2012.
- <sup>37</sup> U.S. Department of Agriculture, Inspection Report, Zooworld Zoological, 58-C-0460, December 3, 2013.
- <sup>38</sup> U.S. Department of Agriculture, Inspection Report, Zooworld Zoological, 58-C-0460, September 24, 2013.
- <sup>39</sup> U.S. Department of Agriculture, Inspection Report, Walking with Lions, 93-C-0297, March 17, 2008 and March 17, 2009.
- <sup>40</sup> U.S. Department of Agriculture, Inspection Report, Have Trunk Will Travel, 93-C-0066, August 18, 2012.
- <sup>41</sup> U.S. Department of Agriculture, Inspection Report, DeYoung Family Zoo, 34-C-0141, July 26, 2011, March 27, 2012.
- <sup>42</sup> U.S. Department of Agriculture, Inspection Report, Triple D Game Ranch, 81-C-0016, October 30, 2013.
- <sup>43</sup> U.S. Department of Agriculture, Inspection Report, Keith Evans, 88-C-0064, May 14, 2010.
- <sup>44</sup> U.S. Department of Agriculture, Inspection Report, Panther Ridge Sanctuary, 58-C-0768, July 1, 2009.
- <sup>45</sup> U.S. Department of Agriculture, Inspection Report, Wild Wilderness, 71-C-0151, March 7, 2013.
- <sup>46</sup> U.S. Department of Agriculture, Inspection Report, Zooworld Zoological, 58-C-0460, December 3, 2013.
- <sup>47</sup> U.S. Department of Agriculture, Inspection Report, Hernando Primate, 58-C-0970, September 28, 2011, April 5, 2012, August 3, 2012, December 13, 2012, August 29, 2013, October 23, 2013.
- <sup>48</sup> U.S. Department of Agriculture, Inspection Report, Catocin Wildlife Preserve, 51-C-0034, January 30, 2009.
- <sup>49</sup> Timothy J. Van Norman, chief, Branch of Permits, U.S. Fish & Wildlife Service, letter to Donovan Smith, Close-up Creatures, December 3, 2010.
- <sup>50</sup> U.S. Department of Agriculture, Inspection Report, Animal Source Texas, 74-B-0315, April 28, 2010.
- <sup>51</sup> *Animal Finders' Guide*, p.8, October 1, 2011.
- <sup>52</sup> Bill Devlin, "Operator of Bucks zoo sued," *The Intelligencer*, October 13, 2011.
- <sup>53</sup> Henry Breaun, "Clark County shuts down popular zoo in Moapa," *Las Vegas Review-Journal*, January 23, 2014.
- <sup>54</sup> Barbara Soderlin, "Roo Ranch closes after owner's death," *Rapid City Journal*, April 12, 2010.
- <sup>55</sup> U.S. Department of Agriculture, Inspection Report, Montgomery Zoo, 64-C-0003, August 24, 2012.
- <sup>56</sup> U.S. Department of Agriculture, Inspection Report, Catocin Wildlife Preserve, 51-C-0034, June 12, 2007.
- <sup>57</sup> U.S. Department of Agriculture, Inspection Report, NBJ Zoological Park, 74-B-0571, June 5, 2013.
- <sup>58</sup> U.S. Department of Agriculture, Inspection Report, Hope Bennett, 57-C-0163, December 6, 2006, April 2, 2011.
- <sup>59</sup> U.S. Department of Agriculture, Inspection Report, Hope Bennett, 57-C-0300, June 27, 2012, March 19, 2013.
- <sup>60</sup> Michael Carpenter, senior biologist for the U.S. Fish & Wildlife Service, e-mail "Subject: zoo arcadiana," May 14, 2009.
- <sup>61</sup> U.S. Department of Agriculture, Inspection Report, March 1, 2010, November 4, 2008, June 28, 2007, June 27, 2007, May 30, 2007, January 11, 2007, and December 14, 2005.
- <sup>62</sup> Britton, Polly, "Financial impact of regulations on owners of 'dangerous wild animals' in Ohio," Ohio Association of Animal Owners, July, 22, 2011.
- <sup>63</sup> Alexandra Zayas, "Where are zoo's tiger cubs?" *St. Petersburg Times*, December 18, 2008.
- <sup>64</sup> Linda Goldston, "Dealers strike it rich at zoos surplus animals resold for 'mind-boggling' profit," *San Jose Mercury News*, February 8, 1999.



- <sup>65</sup> Corporate Officers, Directors and C-Level Executives for EXOTIC WILDLIFE ASSOCIATION, Texas Domestic Nonprofit Corporation, Wysk # V8VGUR4, <http://www.wysk.com/index/texas/ingram/v8vgur4/exotic-wildlife-association/officers>, updated January 3, 2014.
- <sup>66</sup> *Animal Finders' Guide*, Volume 29 Issue 1, p.8, February 1, 2012.
- <sup>67</sup> Steve Krafft, "The travels of one tiger cub," FOX 10 News, November 7, 2011.
- <sup>68</sup> American Association of Zoo Veterinarians, Standard Certificate of Veterinary Inspection, Owner: Wildlife World Zoo, No. 64362, May 2, 2006.
- <sup>69</sup> U.S. Department of Agriculture, Inspection Report, Ar buckle Wilderness, 73-C-0152 and 73-C-0190, March 22, 2007, May 18, 2009, December 5, 2009, March 31, 2010, August 25, 2010, April 26, 2011, August 9, 2011, July 25, 2012.
- <sup>70</sup> U.S. Department of Agriculture, Inspection Report, Claws and Paws Wild Animal Park, 23-C-0013, October 25, 2007, October 6, 2008, August 1, 2012, November 3, 2009, July 19, 2010, April 26, 2011, October 13, 2011.
- <sup>71</sup> Nevada Department of Agriculture, Certificate of Veterinary Inspection, S263342, August 15, 2012.
- <sup>72</sup> Nevada Department of Agriculture, Certificate of Veterinary Inspection, S263341, August 15, 2012.
- <sup>73</sup> U.S. Department of Agriculture, Respondent Big Cats of Serenity Springs, Docket #12-0223, Complaint, January 30, 2012.
- <sup>74</sup> Pennsylvania Department of Agriculture, Certificate of Veterinary Inspection, Seller: Living Treasures, Certificate #A918384, September 2, 2009.
- <sup>75</sup> U.S. Department of Agriculture, Inspection Report, Plumpton Park Zoo, #51-C-0021, July 27, 2010.
- <sup>76</sup> Kim Gamel, "Baghdad zoo welcomes pair of US-donated tiger cubs," Associated Press, August 8, 2008.
- <sup>77</sup> David Kidwell, "Sentenced to 100 years, tattling kingpin freed after 12," *Miami Herald*, August 27, 2000.
- <sup>78</sup> "Popular Petting Zoo Under Investigation For Alleged Animal Cruelty, Drug Violations," WUSA, February 17, 2012.
- <sup>79</sup> Melanie Alnwick, "Reston Zoo director, Meghan Morgensen, charged with animal cruelty," FOX 5 WTTG, June 25, 2012.
- <sup>80</sup> Justin Jouvenal, "Reston Zoo director pleads guilty in drowning of wallaby," *Washington Post*, January 3, 2013.
- <sup>81</sup> Rory Schuler, "Rivers was charged with illegal sale of big cats," *Lebanon Daily News*, July 29, 2004.
- <sup>82</sup> Rory Schuler, "Diving-mule act splashes controversy," *Lebanon Daily News*, July 29, 2004.
- <sup>83</sup> Janet Zink, "Lowry Park believes its former president owes over \$200,000," *St. Petersburg Times*, March 24, 2009.
- <sup>84</sup> Baird Helgeson, "Lowry Park Zoo Tries To Win Back Accreditation Today," *Tampa Tribune*, March 27, 2009.
- <sup>85</sup> Stan Maddux, "Michigan City zoo director suspended," *The Times*, October 20, 2011.
- <sup>86</sup> "Local zoo fined by ministry," *Fort Erie Times Review*, May 2008.
- <sup>87</sup> U.S. Department of Agriculture, Citation and Notification of Penalty, Zooworld Zoological, Reference Number: FL130157 AC, October 28, 2013.
- <sup>88</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Violator Capital of Texas Zoo, October 30, 2013.
- <sup>89</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Violator Wildlife World Zoo, June 28, 2013.
- <sup>90</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Violator Susan Bradshaw, Zooville USA, Case No. FL 130129, March 26, 2013.
- <sup>91</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Violator Scott Edwards, 74-C-0614, July 7, 2013.
- <sup>92</sup> U.S. Department of Agriculture, Inspection Report, Scott Edwards, 74-C-0614, May 22, 2013.
- <sup>93</sup> U.S. Department of Agriculture, Complaint, Respondent Catoctin Wildlife Zoo, AWA Docket No. 12-0165, December 23, 2011.
- <sup>94</sup> U.S. Department of Agriculture, Consent Decision and Order, Respondent Catoctin Wildlife Zoo, AWA Docket No. 12-0165, May 29, 2012.
- <sup>95</sup> U.S. Department of Agriculture, Inspection Report, Animal Sources Texas, 74-B-0315, April 28, 2010.
- <sup>96</sup> U.S. Department of Agriculture, Complaint, Respondent Animal Source Texas, AWA Docket No. 12-0039, October 24, 2011.
- <sup>97</sup> U.S. Department of Agriculture, Consent Decision and Order, Respondent Animal Source Texas, AWA Docket No. 12-0039, March 12, 2012.
- <sup>98</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Violator Leesburg Animal Park, Case No. VA-120015, March 6, 2012.
- <sup>99</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Case No. FL-11039, Violator Jungle Island, January 24, 2012.
- <sup>100</sup> U.S. Department of Agriculture, Settlement Agreement, Respondent Panther Ridge, Case No. FL10200-AC, September 2011.
- <sup>101</sup> U.S. Department of Agriculture, Settlement Agreement, Respondent Tiger World, Case #NC10052-AC, February 20, 2011.
- <sup>102</sup> U.S. Department of Agriculture, Official Warning, Violation of Federal Regulations, Case No. MN-11017, Violator Hemker Park and Zoo, December 15, 2010.
- <sup>103</sup> U.S. Department of Agriculture, Consent Decision and Order, Respondent Zoological Imports 2000, AWA Docket No. 09-0085, May 27, 2009.
- <sup>104</sup> <http://www.aza.org/about-aza/>
- <sup>105</sup> Zoological Association of America History; <http://zaa.org/about-zaa/history-of-zaa>
- <sup>106</sup> <http://www.aza.org/public-benefits/>
- <sup>107</sup> Zoological Association of America Accredited Facilities; <http://zaa.org/accreditation/accredited-facilities>
- <sup>108</sup> <http://www.aza.org/StrategicPlan/>
- <sup>109</sup> Zoological Association of America Mission, Purpose; <http://zaa.org/about-zaa/mission>
- <sup>110</sup> AZA's "The Accreditation Questionnaire (Application), 2014 electronic edition," ANIMAL CARE, WELFARE, & MANAGEMENT (AC) section, AC1 – AC53.
- <sup>111</sup> AZA Accreditation Application, VETERINARY CARE (VC), VC1 – VC28.
- <sup>112</sup> AZA Accreditation Application, PHYSICAL FACILITIES (PF), PF1 – PF20.
- <sup>113</sup> AZA Accreditation Application, SAFETY/SECURITY (SS), SS1 – SS63.
- <sup>114</sup> AZA Accreditation Application, CONSERVATION (C), C1 – C12.
- <sup>115</sup> AZA Accreditation Application, EDUCATION AND INTERPRETATION (EI), EI1 – EI13.
- <sup>116</sup> AZA Accreditation Application, RESEARCH (R), R1 – R9.
- <sup>117</sup> AZA Accreditation Application, GOVERNING AUTHORITY (GA), GA1 – GA15.
- <sup>118</sup> AZA Accreditation Application, STAFF (S), S1 – S21.
- <sup>119</sup> AZA Accreditation Application, FINANCE (F), F1 – F12.
- <sup>120</sup> Zoological Association of America Accreditation Application; [http://www.aza.org/images/pages/misc/ZAA\\_Accreditation\\_Application.pdf](http://www.aza.org/images/pages/misc/ZAA_Accreditation_Application.pdf).
- <sup>121</sup> AZA "The Accreditation Inspector's Handbook," F-8, p.25.
- <sup>122</sup> AZA Accreditation Standards, 9. FINANCE, p.18-19.
- <sup>123</sup> AZA "The Guide to Accreditation of Zoological Parks and Aquariums," THE INSPECTION, OVERVIEW, p.19.
- <sup>124</sup> Zoological Association of America Facility Accreditation Inspection Process; <http://zaa.org/accreditation>
- <sup>125</sup> AZA "The Accreditation Standards and Related Policies," 11.5.2., p. 23.
- <sup>126</sup> AZA Accreditation Standards, "General Administrative Policies," p. 87.
- <sup>127</sup> AZA Accreditation Standards, 11.1.2, p. 20.
- <sup>128</sup> <http://www.aza.org/safety-committee/>
- <sup>129</sup> AZA Accreditation Standards, 11.6.1, p. 23.
- <sup>130</sup> Zoological Association of America, 2014 Animal Care & Enclosure Standards, III. General Regulations of Captive Wildlife, (3) Public contact exhibition, IX. Aquatic & Marine Wildlife, (7) Fish.
- <sup>131</sup> AZA Accreditation Standards, 2.2.1, p. 10.
- <sup>132</sup> <http://www.aza.org/pressroom/detail.aspx?id=391>



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- <sup>133</sup> Karl and Debbie Mogensen, Baby giraffe for sale, Animal Finder's Guide, February 1, 2008.
- <sup>134</sup> Feline Conservation Federation, Board of Directors, Biography for Kevin Chambers; [http://www.felineconservation.org/about\\_us/board\\_of\\_directors.htm](http://www.felineconservation.org/about_us/board_of_directors.htm)
- <sup>135</sup> Zoological Association of America Mission, Purpose; <http://zaa.org/about-zaa/mission>
- <sup>136</sup> AZA Acquisition - Disposition Policy, "18. Under no circumstances should any primates be dispositioned to a private individual or to the pet trade," <http://www.aza.org/ad-policy/>.
- <sup>137</sup> AZA Acquisition - Disposition Policy, "4. Non-domesticated animals shall not be disposed of at animal auctions. Additionally, animals shall not be disposed of to any organization or individual that may use or sell the animal at an animal auction. In transactions with AZA non-members, the recipient must ensure in writing that neither the animal nor its offspring will be disposed of at a wild animal auction or to an individual or organization that allows the hunting of the animal," <http://www.aza.org/ad-policy/>.
- <sup>138</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 2-week-old capuchin monkey to Rainbow Primates, NC, October 29, 2010.
- <sup>139</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 2-week-old capuchin monkey to Rainbow Primates, NC, December 4, 2010.
- <sup>140</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 2-week-old capuchin monkey to Rainbow Primates, NC, March 28, 2011.
- <sup>141</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 2-week-old capuchin monkey to Rainbow Primates, NC, April 27, 2011.
- <sup>142</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 5-week-old capuchin monkey to Rainbow Primates, NC, May 27, 2011.
- <sup>143</sup> Virginia Department of Agriculture Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), 2-week-old capuchin monkey to Rainbow Primates, NC, September 26, 2011.
- <sup>144</sup> Linda Goldston, "Dealers strike it rich at zoos," *San Jose Mercury News*, February 8, 1999.
- <sup>145</sup> American Association of Zoo Veterinarians, Standard Certificate of Veterinary Inspection, Natural Bridge Zoo (Debbie and Karl Mogensen), zebras, kudus, and porcupines to Lolli Bros. Auction in MO, April 6, 2009.
- <sup>146</sup> The Ohio Association of Animal Owners, "Financial impact of regulations on owners of dangerous wild animals in Ohio", October 2011.
- <sup>147</sup> Steven G. Olson, Vice President, Federal Relations, AZA, Comments re: "U.S. Captive-Bred Inter-Subspecific Crossed or Generic Tigers, RIN 1018-AW81; Docket Number FWS-R9-IA-2011; 96300-1671-0000-R4," August 30, 2011.
- <sup>148</sup> Jim Fouts, Chairman, Zoological Association of America, Comments re: U.S. Captive-Bred Inter-Subspecific Crossed or Generic Tigers, RIN Docket Number FWS-R9-IA-2011; 96300, October 5, 2011.
- <sup>149</sup> AZA Accreditation Standards, 1.6.1, p. 29, NOTE: Federal law only requires enrichment for primates.
- <sup>150</sup> <http://www.aza.org/Membership/detail.aspx?id=307>
- <sup>151</sup> <http://www.aza.org/Membership/detail.aspx?id=378>
- <sup>152</sup> AZA Accreditation Standards, 2.1.2, p. 10.
- <sup>153</sup> AZA Accreditation Standards, 2.4.2, p. 11.
- <sup>154</sup> AZA Accreditation Standards, 2.5.1, p. 11.
- <sup>155</sup> Zoological Association of America 2014 Animal Care Standards, V. Standard Caging Requirements for Captive Wildlife. (3) Primates, 4(a) Wild Felines, 4(b) Bears.
- <sup>156</sup> Zoological Association of America 2014 Animal Care Standards, III. General Regulations of Captive Wildlife, (5) Sanitation and Nutritional Requirements (a)-(e)
- <sup>157</sup> AZA Accreditation Standards, 1.5.8, p. 9.
- <sup>158</sup> AZA "Chimpanzee (Pan troglodytes) Care Manual," Exhibit Size, p. 16.
- <sup>159</sup> AZA Tiger Species Survival Plan® (in press, 2014). Tiger Care Manual. Association of Zoos and Aquariums, Silver Spring, MD, p. 12, "Spatial recommendations" and "Water Placement and Presentation."
- <sup>160</sup> Zoological Association of America 2014 Animal Care Standards, V. Standard Caging Requirements for Captive Wildlife. 3(d) Apes 2. Chimpanzees and Orangutans (a); <http://zaa.org/accreditation/zaa-standards>
- <sup>161</sup> Zoological Association of America, 2014 Animal Care & Enclosure Standards, V. Standard Caging Requirements for Captive Wildlife, (1) Wild Felines.