

Zoological Association of America

Analytical Report of Standards, Practices, and Facilities

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



THE HUMANE SOCIETY
OF THE UNITED STATES

“[Expanding permission to ZAA facilities to keep large carnivores in Michigan] could lead to gaps in public health protection and animal welfare.”

Michigan Governor Rick Snyder, in vetoing changes to Michigan’s Large Carnivore Act¹

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Executive Summary

The deceptively-named Zoological Association of America (ZAA) has weak standards, 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. Attempts to exempt ZAA facilities from state dangerous wild animal laws were defeated in California, Louisiana, Michigan, and Texas.^{2,3,4} And officials in Clark County, Nevada, rejected a ZAA exemption in a new ordinance after two ZAA backyard menageries had caused a significant burden to county officials over safety and code violations.⁵ 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.

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. One ZAA facility offers close encounters with a liger (a tiger-lion hybrid), which is unhealthy for the animal and equally damaging to conservation. 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 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.⁶ Such opposition demonstrates a callous disregard for conservation and welfare issues.

Concerns about ZAA's facilities, members, and activities include the following:

- Unprofessional conduct that includes wildlife trafficking, cruelty to animals, providing false information to law enforcement, and misappropriation of assets from taxpayer-supported zoos
- People have been critically injured and suffered permanent disabilities from attacks by animals ranging from elephants to big cats to chimpanzees at facilities operated by ZAA members
- Allowing the public to have 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 animal welfare concerns, such as:
 - inadequate veterinary care
 - inhumane methods of euthanasia
 - 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

ZAA's vague accreditation standards allow conditions that were common at zoos 30 or 40 years ago, but which are totally inconsistent with modern animal care practices. ZAA's accreditation inspections are inadequate and, in some cases, ZAA accredits facilities without conducting an accreditation inspection.

On the other hand, the AZA has a rigorous and comprehensive accreditation process as well as 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.

ZAA's Abusive Treatment of Tiger Cubs



This tiger cub, used for public handling, was punched, slapped, dragged, and choked as a means to make him cooperate during photo sessions.

In 2014, HSUS conducted undercover investigations at two roadside zoos—Tiger Safari (TS) in Oklahoma, owned by Bill Meadows and accredited by ZAA affiliate Feline Conservation Federation, and Natural Bridge Zoo (NBZ) in Virginia, owned by ZAA professional members Karl and Debbie Mogensen. Both facilities use tigers supplied by ZAA-accredited Myrtle Beach Safari (a.k.a. T.I.G.E.R.S.) owned by ZAA professional member Kevin Antle in South Carolina. Antle is a tiger breeder who warehouses dozens of tigers in box stalls in a horse barn and offers public contact with tigers, chimpanzees, orangutans, and other dangerous wild animals.

TS, NBZ, and MBS are among many ZAA members and affiliates that breed and acquire tigers for the sole purpose of using cubs for photo ops with the public.

The investigations of ZAA members and affiliates revealed:

- Food deprivation and excessive hunger, which caused the cubs a great deal of stress and frustration, was used to control the cubs while they were handled by children and adults.
- The cubs were fed a nutritionally-deficient diet, which could cause metabolic bone disease, a common ailment of privately owned, hand-reared tiger cubs.
- During the nearly 5-month investigation, the cubs at NBZ were never seen by a veterinarian and TS blatantly ignored veterinary recommendations to provide the cubs with a proper diet and vet care.
- The cubs were handled by dozens of people daily, which disrupted their sleep and rest.
- The public handled cubs infected with ringworm, coccidia, and giardia.
- The cubs were routinely subjected to physical abuse, such as being hit, smacked, punched, choked, and dragged.



These tiger cubs, infected with ringworm, were used for public handling.



This 3-week-old tiger cub, infected with ringworm, was handled by 27 people at TS on the very day that she endured a 19-hour car ride from MBS.



A tiger cub, used for public handling, is being hit on the face.

Public handling began at TS and NBZ when the tigers cubs were 3 to 4 weeks of age respectively. At such a young age, the cubs are especially vulnerable to illness because their immune systems are not yet developed. Since the cubs were pulled from their mothers during birth, they were also deprived of the benefit of maternal antibodies contained in mother's milk.

The tigers continued to be used for public handling until they were more than 17 weeks old, weighed close to 50 pounds, and were considerably more dangerous and difficult to handle.

Experts Oppose Public Contact with Big Cats

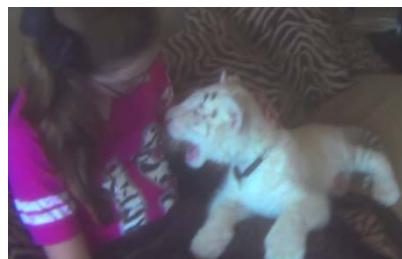
According to Ronald Tilson, Ph.D., who coordinated the AZA Tiger Species Survival Plan from 1987 to 2011 and has decades of experience in tiger husbandry:

- Allowing public contact with animals who are often unhealthy poses a risk to public health and safety.
- Prematurely removing a big cat cub from its mother is not condoned by the majority of animal care professionals because it negatively impacts the welfare of both the cub and its mother.
- Hand-reared cubs are susceptible to behavioral disorders, causing them to display abnormal traits as adults.
- Big cats normally sleep up to 80 percent of every 24-hour day, but public handling severely interrupts this sleep cycle, causing exhaustion, anxiety, and illness.
- The business of using these animals as photographic props undermines legitimate conservation efforts.



A juvenile tiger weighing nearly 50 pounds is used for public handling.

Agitated tiger cubs bite at members of the public.



“You take that fist and you punch him right in the nose as hard as you can.”

Bill Meadows instructing his niece to discipline tiger cubs



A small child peeks out over the top of a juvenile tiger during a photo session.



Inches away from a baby, this juvenile tiger reaches out with his claws and knocks a bottle from a man's hand.



A tiger cub infected with coccidia and giardia has unsafe contact with infants, toddlers, and small children.



A tiger cub struggles and slips from a boy's grasp.

Hidden dangers

The National Association of State Public Health Veterinarians recommends against public contact with wild and exotic carnivores, such as lions and tigers, because of their strength, unpredictability, and the pathogens they may carry.

In addition to documented cases of tiger cubs infected with ringworm, coccidia, and giardia being used for public handling, a significant number of captive exotic cats commonly shed *Salmonella* in their feces, including drug-resistant strains, putting those who handle the animals at risk. Further, a single bite wound from an exotic cat can spread multiple pathogens, including a *Pasteurella*-like bacteria.



Analysis of a ZAA Accreditation Inspection

Wright Park Zoo in Dodge City, Kansas

According to the following report, the ZAA accreditation inspection of Wright Park Zoo was conducted by ZAA co-founder Jim Fouts and Wright Park Zoo's veterinarian, Dr. Darin Huck. Since half of the 2-person inspection team was affiliated with Wright Park Zoo, there was a built-in bias to the inspection process. In contrast, AZA does not allow inspection team members to be affiliated with the zoo that is being inspected.

The ZAA inspection took just 2½ hours, which appears to be an insufficient amount of time to conduct a thorough inspection of the facility's animal enclosures and buildings, animals, protocols and records, as well as conduct staff interviews. Even for a small facility, an AZA accreditation inspection would take a minimum of two days.

Inspectors with the U.S. Department of Agriculture (USDA) and casual zoo visitors have observed more deficiencies at Wright Park Zoo than the ZAA inspectors. Since ZAA's 2010 accreditation inspection of Wright Park Zoo, the USDA has cited the zoo for 40 violations of the Animal Welfare Act, including 14 citations for cages in disrepair (such as a tiger cage with a broken weld), 5 citations for failure to address the psychological well-being of primates—including a self-mutilating macaque placed on an anti-anxiety drug, 5 citations for inadequate veterinary care, and 5 citations for poor sanitation. In 2015, the USDA issued an official warning against Wright Park Zoo for repeated violations.

And visitors to Wright Park Zoo who posted reviews on TripAdvisor describe the zoo as "Small, outdated, and not at all well kept," "with a lot of concrete and bars," "not organized," and "animals looking kinda grim."

The narrative from the ZAA inspection regarding safety procedures at Wright Park Zoo, which possesses big cats, bears, and primates, simply states, "While not the bible some zoos produce, [it] is to the point. Could be a bit more specific." This indifference to safety measures is consistent with ZAA's animal handling practices that allow unsafe public contact with 90-pound bears, tiger and lion cubs, chimpanzees and orangutans, and even elephants; the fact that ZAA does not require accredited facilities to have insurance protection for visitors, staff, and volunteers; and there is no review of staff training and protocols for the use of capture equipment.

In total, AZA inspectors review 56 items related to safety and security versus just four for ZAA's inspection of the Wright Park Zoo.

The ZAA inspection report for Wright Park Zoo would lead a reasonable person to assume that the zoo could not qualify for accreditation. In 19 of 20 categories the zoo was rated as merely satisfactory or in need of correction. The report clearly stated that the zoo was insufficiently staffed and even the medical care and nutritional needs of the zoo's animals—the very services provided by one of the ZAA inspectors—were considered only satisfactory. Yet, astoundingly, the zoo was granted accreditation.

And in some cases, such as for the Montgomery Zoo in Alabama, accreditation is granted with no accreditation inspection at all.

Zoological Association of America

Accreditation Program - Inspection Form

New Renewal

Facility Name: Wright Park Zoo

Address: P O Box 880

City: Dodge City

State: KS Zip: 67801

Owner/Manager: Tony Hornberger

Is this facility Public Private Educational

Inspection Date: 8/26/10

Inspector # 1: Jim Fouts

Inspector # 2: DR Darin Huck

Start Time/Date: 10:45

Finish Time/Date: 1:15

Recommendation of Inspection Team:

Approve: Deny: Table:

Remarks: We recommend approval

J Fouts 8/26/10

Darin Huck 8/26/10

1.) Physical Facilities:

- A.) How are the animals maintained? Describe the physical facilities, islands, aviaries, pastures, buildings, etc. Attach photos.

Need to correct _____ Satisfactory Excellent _____

Remarks *photos enclosed. Overall some facilities are old - (tigers, bears, etc) but are well maintained & clean. A variety of other facilities for primates, small mammals are well kept*

- B.) What is the overall condition and appearance of the facilities?

Need to correct Satisfactory Excellent _____

(If this is a public facility, is it attractively laid out? Is it designed for people and animals?)

Remarks **I would suggest that the marmoset facility indoors be rebuilt to give animals & keepers more vertical space (both sides) of this room should be redone. New bison yard to be constructed should have a catch pen/alley way to be able to handle & work on the bison.*

- C.) Is there a regular program for building, mechanical, exhibit, and ground maintenance?

Need to correct _____ Satisfactory Excellent _____

Remarks *The facility is maintained by city crew and is reasonably well kept. Keepers mow grass & maintain exhibits.*

2.) Collection type:

- A.) Number of specimens: Birds 90 Mammals 34 Reptiles 0

- B.) Number of species: Birds 21 Mammals 18 Reptiles 0

3.) Level of Animal Care:

- A.) Are the number of specimens and/or species appropriate for the size of the exhibits?

Need to correct _____ Satisfactory Excellent _____

Remarks *Seem to be OK*

B.) How many care for the collection? 2 Is this adequate? yes
Need to correct _____ Satisfactory Excellent

Remarks Actually 1 fulltime, 1 1/4 time. While the zoo looks nice the keepers sometimes work 7 days a week partial days so not to exceed 40 hrs. The Zoo really should have at least one other parttime position -

C.) Knowledge of personnel actually maintaining the collection.

Need to correct _____ Satisfactory Excellent

Remarks Supervisor Tony has been at the zoo 3 1/2 yrs, assistant keeper working 5 years -

D.) Does the veterinary care provided for the animal collection appear sufficient?

Need to correct _____ Satisfactory Excellent

Remarks Yes - Dr. Huck has a special interest in the Zoo and does a lot of work pro bono as the zoo has a small veterinary budget.

E.) Is the institution's preventative medicine program adequate and implemented?

Need to correct _____ Satisfactory Excellent

Remarks Practices regular deworming program ^{Vet} & does regular wallthrus with supervisor, vacinates for prevention (West nile, rabies, etc)

F.) In the event of an emergency, when the veterinarian is not on premises, is the response time adequate?

Need to correct _____ Satisfactory Excellent

Remarks 3 vet in clinic that serve the zoo + 24 on call service

4.) Collection Diets:

A.) Are the nutritional requirements of the collection being met?

Need to correct _____ Satisfactory Excellent _____

Remarks consults regularly with vet & zoo colleagues, attends conferences

B.) How are the nutritional needs of the collection determined?

Need to correct _____ Satisfactory Excellent _____

Remarks thru consultation with vet & other zoos, & conferences

C.) Food storage areas, pest control.

Remarks good storage & pest control, freezers clean

5.) Security - Risk Management Plan:

A.) Are there safety procedures for the animal collection, visitors and Staff? Need to correct _____ Satisfactory Excellent _____

Remarks attached - while not the bible some zoos produce is to the point. Could be a bit more specific

B.) Is there a safety plan for animal escapes?

Need to correct _____ Satisfactory Excellent _____

Remarks see above - attached

C.) Is there a safety plan for disasters both natural and man-made?

Need to correct _____ Satisfactory Excellent _____

Remarks see above - attached

D.) Is there a provision for the collection beyond the owner's life?

Need to correct _____ Satisfactory _____ Excellent _____

Remarks N.A. City Zoo

6.) Recorded Collection Data:

A.) Are animal health files maintained and up to date?

Need to correct _____ Satisfactory Excellent _____

Remarks Dr. Huck maintains health records at clinic; copies kept in zoo office

B.) Is acquisition and disposition information kept on file?

Need to correct _____ Satisfactory Excellent

Remarks files available in office and seem to be complete

C.) Is reproduction information of the collection recorded?

Need to correct _____ Satisfactory Excellent _____

Remarks Yes - breeding limited as zoo is small

D.) How are collection specimens individually identified?

Need to correct _____ Satisfactory Excellent _____

Remarks New animals (mammals) microchipped; birds mostly common domestic species so no id's given

7.) Licensing and Permits:

A.) Are all appropriate permits and inspections on file and current?

Need to correct _____ Satisfactory Excellent _____

Remarks USDA permit 48-C-0140 attached - no other permits required

8.) Continuing Education:

A.) Membership in other organizations. Subscriptions to industry publications. Attendance at conferences, seminars or symposiums

Need to correct _____ Satisfactory Excellent _____

Remarks AAZK, ZAA Conference

B.) Involvement in environmental, educational, conservation programs.

Need to correct _____ Satisfactory _____ Excellent _____

Remarks No - Very small zoo

9.) Educational Facilities:

A.) Are the programs held on-site , off-site _____, both _____?

B.) How many presentations are averaged a year? 10

C.) Who are the audiences? Mostly grade schools, some developmental groups

D.) Who performs the presentations. (owner, paid staff, volunteers)

Supervision

E.) How are presenters trained? no formal training, observing other zoo programs & working with educators

F.) If off-site presentations are done, how are the vehicles designed?
Are they safe and provide comfort for the animals? How is food and water transported/stored for the animals?

NA

- G.) Is the public allowed contact with the animals? Yes No _____
If so, what are the policies and procedures when there is contact?

Goats | sheep | llama thru or over fence, No contact
in enclosure

- H.) Are Class I animals used in presentations? Yes _____, No
If so describe the safety policies.

- I.) For on-site presentations, are they performed in classrooms, arenas, outdoor stages? Tours of facility

- J.) What other educational materials are used in programs?
Only graphics & animal artifacts -

- 10.) Total number of employees: Full time Part time ^{1-3/4 time}

① Remarks The Zoo could use a few more animals - has some empty enclosures.
② Certainly should have at least one more part time employee.
③ Could work to develop & cultivate an education program.
This has NOT been done to date probably due to lack of time required due to short staffing

Questions may be routinely added or deleted from the above by the Board of Directors. Further, the Accreditation committee may add any information concerning the Applicant or their Inspection Evaluation that they deem important. The Accreditation Committee may, at its discretion, allow the Applicant time to correct/improve deficiencies.

Evaluations for Accredited Members shall occur every 5 years or as deemed necessary by the Board of Directors.

INSPECTORS- Please feel free to attach any additional materials, permits, licenses, brochures or narrative that you feel will be helpful in judging this facility.

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
Year established	1924 ⁷	2005 ⁸
Accredited Facilities	223 ⁹ (primarily city-run zoos or zoos operated by a non-profit zoological society).	57 ¹⁰ (primarily privately-owned roadside zoos and menageries).
Mission	“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.” ¹¹	One stated purpose of ZAA is to “Protect and defend the right to own exotic and domestic animals, both privately and publicly ...” ¹²
Accreditation Application	A comprehensive 29-page document that requires detailed information about the facility’s animals, ¹³ veterinary care, ¹⁴ physical facilities, ¹⁵ safety and security, ¹⁶ conservation, ¹⁷ education, ¹⁸ research, ¹⁹ governing authority, ²⁰ staff, ²¹ operating budget and sources of funding, ²² and also requires copies of the facility’s policies, procedures, records, lists, and reports.	A simple 9-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. ²³
Insurance	Insurance required covering visitors, staff, volunteers/docents, and physical facilities. ²⁴	No reference to insurance in its standards or accreditation application.
Fiscal responsibility	Institution must demonstrate financial stability. ²⁵	No reference to financial stability, operating budgets, or funding sources.
Inspection process for new facilities	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. ²⁶	Two ZAA professional members (which could include convicted felons or owners of facilities with serious and chronic Animal Welfare Act violations) separately evaluate the facility. ²⁷
Inspection process for re-accreditation	Each facility must go through the entire accreditation process every five years to ensure that facilities are maintaining the highest standards of animal care. ²⁸	Re-accreditation requires only one inspector. ²⁹

	AZA	ZAA
Safety and security for potentially dangerous large carnivores, large reptiles, medium to large primates, and large hoofstock	<ul style="list-style-type: none"> • Alarm systems in place for animals posing serious threat of catastrophic injury and/or death.³⁰ • Protocols and procedures in place to notify staff in the event of a bite injury, attack, or escape. • Conducts routine emergency drills to insure procedures are followed in the event of an attack or escape. • 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.³¹ 	The 2015 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.
Public handling of big cat cubs, bear cubs, and primates	<p>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.³²</p> <p>AZA-accredited zoos in Michigan opposed a bill to weaken existing state law by allowing the public to handle and pose with bear cubs up to 90 pounds.³³</p> <p>Citing concerns for animal welfare and public safety, the AZA opposed a bill to weaken existing state law in Kansas by allowing public contact with tiger, lion, and other big cat cubs.³⁴</p>	<p>At least a dozen ZAA facilities and members offer public handling of big cat cubs, bear cubs, and/or primates.</p> <p>A ZAA-accredited menagerie in Michigan allows the public to handle and pose with bear cubs up to 90 pounds.</p> <p>ZAA supported a bill to weaken existing state law in Kansas by allowing public contact with tiger, lion, and other big cat cubs.</p>
Zoonotic diseases	<p>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.³⁵</p> <p>A tuberculin (TB) testing/surveillance program must be established for appropriate staff in order to ensure the health of both the employees and the animals.³⁶</p>	<p>One sentence about minimizing zoonotic disease risks during quarantine of fish and one sentence about “sanitary precautions” for wildlife used in public contact.³⁷</p> <p>No requirement or recommendation for a tuberculosis testing and surveillance program.</p>

	AZA	ZAA
Safety committee	A 25-member Safety Committee disseminates best practices, recommends changes in best practices and professional training, reviews incident investigations, and addresses emerging safety issues. ³⁸	No safety committee.
Security	Security on a 24-hour, year-round basis. ³⁹	No requirement for 24-hour security.
Controlled substances	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. ⁴⁰	No references to use or secure storage of controlled substances.
Exotic Pets	Policy recognizing that wild animals do not make good pets. ⁴¹	ZAA defends the right of individuals to own exotic animals and accredited facilities and members breed and sell a variety of wild animals to the public. ^{42,43,44}
Sample animal disposition policies (primates, auctions, and hunting)	Primates may not be sold, traded, or given to individuals or to animal dealers known to place primates with individuals. ⁴⁵ 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. ⁴⁶	Members sell primates to pet monkey dealers and to private parties. ^{47,48,49,50,51,52} No policy against hunting zoo animals or selling them at auctions. Evidence of facilities selling wild animals at auction, to hunting ranches and canned hunt operators, 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. ^{53,54,55,56}
Species Survival Plan (SSP)	Captive breeding is conducted on the basis of sound science and professional husbandry standards, analyzing genetic lineages and making breeding recommendations that preserve and/or increase genetic integrity and account for the space available within SSP participating zoos for adult animals. ⁵⁷	Animals are bred, and inbred, with no regard for genetic diversity or permanent placement for adult animals. Tiger cubs are produced year-round solely to supply the demand for public handling and without a commitment to provide appropriate and life-long care.
Illegal trade in tiger parts	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. ⁵⁸	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. ⁵⁹

	AZA	ZAA
Animal welfare	<ul style="list-style-type: none"> Facilities provide species-specific behavioral enrichment and husbandry that greatly exceed the minimum standards of federal law.⁶⁰ A 12-member Animal Health Committee ensures high quality and comprehensive animal health care.⁶¹ An 18-member Animal Welfare Committee develops assessment tools and drives the creation of detailed, species-specific animal care manuals.⁶² Veterinary coverage must be available to the animals 24 hours a day, 7 days a week.⁶³ Keeper are trained to recognize abnormal behavior and clinical symptoms of illness and dietary and husbandry requirements.⁶⁴ A 9-member Nutrition Scientific Advisory Group develops guidelines to enhance feeding programs based on sound scientific principles.⁶⁵ Necropsies are performed on deceased animals to determine if the cause of death may be related to nutritional status or other aspects of husbandry.⁶⁶ 	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. ^{67,68}
Open door policy	Institutions must develop a clear process for identifying, communicating, and addressing animal welfare concerns within the institution in a timely manner, and without retribution. ⁶⁹	No policy for staff to communicate animal welfare concerns.
Sample caging requirements (chimpanzees and tigers)	<p>2,000-square-feet of indoor and outdoor space and useable vertical heights of over 20 feet for chimpanzees.⁷⁰</p> <p>A minimum of 1,206-square-feet per enclosure, with 50 percent more floor space added for each additional tiger; minimum vertical height of 12 feet for top-covered enclosures; and tigers must be provided with a pool large enough for swimming.⁷¹</p>	<p>240-square-feet and 8 feet of vertical height for chimpanzees⁷²</p> <p>360-square-feet for up to two tigers with 25 percent more floor space for additional tigers, vertical height of 8-feet for top-covered enclosures, and no requirement for a pool.⁷³</p>
Social needs of elephants	Female elephants must be kept in social groupings of at least three elephants. ⁷⁴	Two ZAA members—Natural Bridge Zoo and Myrtle Beach Safari—house solitary female elephants. ^{75,76}

Problems with ZAA facilities and members

Unless otherwise noted, the photos in this section were taken at Catoctin Zoo* in Thurmont, Maryland, and Natural Bridge Zoo† in Natural Bridge, Virginia. In September 2013, The HSUS arranged for two captive wildlife experts with more than 80 years of combined experience to visit and evaluate the ZAA-accredited Catoctin Zoo*. The experts observed injured animals, inappropriate mixed-species exhibits, undersized and outdated cages, poorly designed, unhealthy, and potentially unsafe exhibits, filthy cages, dirty drinking water, soiled food bowls, a lack of enrichment for many species, and enclosures in disrepair.

During a 2014 undercover investigation of the Natural Bridge Zoo†, owned by ZAA professional members, HSUS gathered evidence demonstrating that the zoo:

- Failed to provide adequate veterinary care to sick and injured animals
- Failed to safely and humanely handle animals, causing extreme distress
- Failed to provide animals wholesome, uncontaminated food and proper nutrition
- Failed to properly clean cages—maggots, algae and mushrooms were commonly found growing in filthy enclosures
- Failed to separate animals who were not compatible, resulting in fighting, injuries, illness and death
- Failed to provide clean drinking water or any water at all
- Failed to provide enrichment for the psychological well-being of primates
- Failed to control insect bird, and rodent infestations
- Failed to properly train staff and maintain an adequate number of staff

Many of these findings were substantiated in a subsequent 27-page USDA inspection report that cited Natural Bridge Zoo† for 31 violations of the federal Animal Welfare Act.

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



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

Attacks

- In 2016, Virginia Safari Park* agreed to settle a lawsuit by paying \$155,000 after a 10-year-old girl was hospitalized for several days when she was bitten on the arm by a camel.⁸¹
- In 2015, an 8-year-old boy was scratched and bitten by a lemur who jumped onto him during a “hands on” program at Zooworld* in Florida. The boy sustained two approximately 1-inch-long scratches on the back of his neck and a bite to his ear lobe.⁸²
- In 2014, a construction worker at the Zoological Wildlife Foundation* in Florida had his thumb bitten off by a tiger when he stuck his hand into the animal’s cage. Emergency responders rushed the man to a hospital for treatment.⁸³
- In 2014, several university students were bitten during a public



A tiger is able to fit his paw through a gap in the enclosure.



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

handling session with two 3-month-old, 30-pound lion cubs at Six Flags Great Adventure* in New Jersey.^{84,85}

- In 2014, a woman was bitten by a 14-week-old African lion cub during public contact exhibition at Wild Wilderness Safari† in Arkansas.⁸⁶
- In 2014, a worker at McCarthy's Wildlife Sanctuary† in Florida was hospitalized in critical condition after she was bitten on the hand by a spectacled cobra while cleaning the snake's cage. Expensive antivenin for the exotic snake bite had to be flown in by Miami-Dade Fire Rescue helicopter because the facility did not keep a supply of antivenin on hand.^{87,88}
- In 2013, a woman visiting Two Tails Ranch* in Florida was hospitalized with life-threatening injuries after she was attacked during unsupervised contact with an elephant.^{89,90}
- 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.⁹¹
- In 2010, a jaguar at the Panther Ridge Conservation Center† in Florida tore off a woman's thumb.⁹²
- In 2009, an inexperienced and unsupervised animal care worker at Catoctin Zoo* in Maryland was attacked and critically injured by two jaguars.^{93,94}
- In 2008, Judy Berenst†, 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.^{95,96}
- In 2004, in two separate incidents at Wild Wilderness Safari† in Arkansas, a woman was bitten by a tiger and a worker lost two fingers when she was bitten by a chimpanzee.^{97,98}
- In 2002, two workers were attacked by cougars at Wild Wilderness Safari† in Arkansas.^{99,100}

Escapes

- In 2016, a guenon at the Forest Park Zoo* in Massachusetts escaped by opening the unlocked door of his enclosure. The primate was recaptured three days later.¹⁰¹
- In 2014, a bear cub being transported by Vogel Exotics† in Minnesota broke out of a travel crate and escaped from a trailer. The facility was



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



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

unaware of the escape until reaching their final destination. Local authorities captured the bear cub.¹⁰²

- In 2014, an alligator escaped from Washington Park Zoo* in Indiana and was found at a nearby boat dealership.¹⁰³
- 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 approximately 30 minutes.¹⁰⁴
- 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.¹⁰⁵
- In 2012, an alligator escaped from Jo-Don Farms† in Wisconsin and was loose for several months.¹⁰⁶
- 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.^{107,108}
- In 2010, a 500-pound tiger, owned by Kevin Antle† and on exhibit 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.^{109,110} Following the escape, Antle was cited by the USDA for housing the tiger in an enclosure that was even less secure than the one he had previously escaped from.¹¹¹
- 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.^{112,113,114}
- 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.^{115,116}
- In 2008, a spider monkey escaped from Washington Park Zoo* in Indiana and was found at a nearby boat dealership.¹¹⁷
- 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.^{118,119}
- 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.¹²⁰
- In 2005, a 500-pound Bengal tiger escaped from a cage at Panther Ridge Conservation Center† by pushing past a woman who was



Visitors are able to reach across inadequate safety barriers and touch capuchin monkeys and gibbons.



In many of the poorly-designed cages, animals have an opportunity to escape every time a cage door opens.

feeding him. More than 20 sheriff's deputies and state wildlife officers responded as the tiger wandered the grounds for more than two hours.¹²¹

- 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.¹²²

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.^{123,124,125,126}
- Tanganyika Wildlife Park* in Kansas was cited by the USDA for allowing a lemur to interact with and sit on a human infant who was in a carrier on the ground, which "resulted in risk of disease transmission, injury to the public, and injury/stress [to] the animal."¹²⁷
- Six Flags Discovery Kingdom* in California was cited by the USDA for allowing the public to have unsafe contact with an elephant, which put "the public and the animals at risk of serious consequences in the event of unanticipated behavior."¹²⁸
- Gulf Breeze Zoo* in Florida was cited by the USDA for repeatedly failing to provide sufficient public safety barriers around primate cages.^{129,130}
- Lion Habitat Ranch* in Nevada was cited by the USDA for allowing the public to have unsafe contact with adult lions.¹³¹
- Wild Wilderness Safari† in Arkansas was cited by the USDA for repeatedly failing to provide sufficient safety barriers, including for enclosures containing rhinos, hippos, and clouded leopards.¹³²
- Zooworld* in Florida was cited by the USDA for:
 - Insufficient safety barriers that could allow members of the public access to primate and big cat cages.^{133,134,135}
 - Failure to quarantine a recently acquired wild skunk—a species that is 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.¹³⁶
- Walking with Lions† in California was cited repeatedly by the USDA for allowing members of the public to have direct contact with big cats.¹³⁷
- Have Trunk Will Travel* in California was cited by the USDA for unsafe



A female spider monkey caged with an aggressive male suffered a hand injury that was neglected for two weeks until the wound became badly infected.



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

handling of elephants while giving rides to the public.¹³⁸

- 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.”¹³⁹

Declawing big cats

- In 2013, Dirk Arthur† in Nevada was cited for declawing two juvenile tigers and one juvenile lion, despite having been previously warned by the USDA that declawing large felids was not allowed under the Animal Welfare Act.¹⁴⁰
- In 2013, Triple D Game Farm* in Montana was cited for declawing a 2-month-old tiger cub.¹⁴¹
- In 2010, Lion Habitat Ranch* in Nevada was cited for declawing two lion cubs.¹⁴²
- In 2009, Panther Ridge† in Florida was cited for declawing two clouded leopards.¹⁴³

Welfare concerns

- In 2016, the USDA cited Wildlife World Zoo* in Arizona for failure to provide supplemental heat to 59 primates housed outdoors in temperatures that dropped to 36 degrees. Numerous primates were observed huddled together and shivering. The facility was also cited for failure to provide adequate shelter from the cold, filthy and rodent-infested conditions, inadequate public safety barriers, and inadequate veterinary care.¹⁴⁴
- In 2016, the USDA cited Wright Park Zoo* in Kansas for failure to provide veterinary care to a sheep with rapid respiration and an altered gait and a macaque still exhibiting self-injurious behavior and suffering hair loss (the attending veterinarian recommended the macaque be relocated to another facility or placed on anti-anxiety medications), as well as repeatedly failing to have an adequate enrichment plan for primates.¹⁴⁵
- In 2016, the USDA cited Bearizona* after an animal, presumably a cougar, entered the facility and killed a Dall lamb and for the death of a Dall sheep who was killed by a male goat after an employee left a gate open.¹⁴⁶
- In 2016, the USDA cited California Living Museum* for failure to observe animals on a daily basis, failure to promptly communicate health issues with the attending veterinarian, and failure to separate incompatible animals. The decomposed bodies of two foxes were found in a poorly maintained enclosure and adequate veterinary care was not provided to a fox with a leg injury, a fox with eye



An elderly and underweight pregnant giraffe was found dead. She had not fully recovered from giving birth to twins before being bred again.



Rather than separate incompatible monkeys, a DeBrazza monkey's teeth were filed down with a rotary grinder to prevent him from inflicting bite wounds on his cage mates. The monkey was only partially sedated and began struggling during the procedure.

- inflammation, and a deer with a swollen hock and injured hoof.¹⁴⁷
- In 2016, the USDA cited Myrtle Beach Safari* for failure to have an adequate veterinary care program for a recurring problem of tiger cubs infected with ringworm, including addressing public safety issues.¹⁴⁸
- In 2016, the USDA cited Pittsburgh Zoo* for failure to provide sea lions with adequate shade and unhealthy chlorine levels in their pool, both of which may be contributing to the long history of sea lions suffering from painful eye disorders at the facility.¹⁴⁹
- In 2016, the USDA cited Animal Source Texas‡ for failure to provide veterinary care to four gemsbok who were weak and covered with ticks and one day were “found dead” and for disposing of three dead kudu and one dead gemsbok in an unapproved watershed area, which could facilitate spread of disease.¹⁵⁰
- In 2015, the USDA cited Zooworld* in Florida for failure to provide relief from excessive heat to primates showing signs of heat exhaustion on a day that the heat index was 115 degrees in the shade.¹⁵¹
- In 2015, the USDA cited Zoological Wildlife Foundation* for failure to provide veterinary care to primates who were fighting and causing injuries to each other and failure to provide adequate enrichment to three singly-housed primates.¹⁵²
- In 2015, the USDA cited Wright Park Zoo* in Kansas for failure to provide any bedding during bitterly cold temperatures to its wolf-dogs, failure to provide veterinary care to a macaque exhibiting self-injurious behavior and suffering hair loss on both forearms, as well as repeatedly failing to have an adequate enrichment plan for primates.¹⁵³
- During a 4-day inspection conducted in January 2015 in response to an HSUS undercover investigation, the USDA cited Natural Bridge Zoot in Virginia for 31 Animal Welfare Act violations, including:¹⁵⁴
 - Inhumanely killing guinea pigs by slamming the animals on a concrete floor.
 - Failure to provide veterinary care to 35 animals with various health issues.
 - Using physical abuse on an injured DeBrazza monkey by jabbing him with sticks.
 - Allowing the public to handle tiger cubs as young as 4 weeks of age before the cubs have fully intact immune systems and are susceptible to many infectious diseases.
 - Using tiger cubs who were too big and too strong for public handling.
 - Unsafe handling of an elephant.



An untrained keeper is cleaning a macaque cage wearing only gloves and no face mask, eye shields, or other protective gear, despite the danger of contracting the deadly Herpes B virus from macaques. At AZA-accredited zoos, keepers wear personal protective equipment, such as biohazard safety suits when working around many primate species.



No environmental enrichment is provided to promote the psychological well-being of the many primate species kept in small, barren cages.

- Failure to provide food and water to bears who were locked in a den from December through March in an attempt to force hibernation.
- Failure to provide primates with minimum space and environment enrichment.
- Filthy and cluttered conditions and a severe rodent infestation.
- In 2015, Wildlife World Zoo* was cited by the USDA for concealing areas that contained regulated species from the inspector. The facility was also cited for failure to have an attendant present while the public had contact with giraffes and kangaroos, filthy cages, enclosures in disrepair, unsanitary feeding practices, filthy water receptacle, and housing animals near a foul-smelling garbage dump.¹⁵⁵
- In early 2015, the public learned of two preventable primate deaths at the Forest Park Zoo* in Massachusetts. A marmoset died from injuries sustained in a fight with other monkeys, and a tamarin died from exposure to cold temperatures after the zoo failed to have a back-up generator when an electrical malfunction shut off power to a heating system.¹⁵⁶
- In 2014, Bearizona* in Arizona was cited repeatedly by the USDA for failure to provide adequate veterinary care to sick animals.^{157,158}
- In 2014, Reston Zoo in Virginia, one of three zoos owned by Eric Mogensen†, was cited by the USDA for:^{159,160}
 - Ignoring veterinary recommendations to provide urgent veterinary care to an African porcupine who was left outdoors for hours in 8-degree weather. The warm-weather porcupine subsequently died.
 - Failure to provide adequate veterinary care to a camel who exhibited pain and lameness and was thin with hairloss over most of his body.
 - Subjecting a Scottish highland cow to unnecessary pain and distress by refusing to provide adequate veterinary care for more than a month to a progressively worsening head wound.
- In 2014, Wild Wilderness Safari† in Arkansas was cited by the USDA for repeated failure to provide numerous animals, including primates who were losing fingertips, toes, and tails to frostbite, with adequate shelter, repeated failure to provide injured animals with veterinary care, storing food in filthy and unsanitary conditions, providing animals contaminated food and water, filthy cages, and insufficient public safety barriers in all areas of the facility.^{161,162,163}
- In 2014, Six Flags* in California was cited by the USDA for the deaths of two dolphin calves that were apparently related to poor water



A baby camel suffered a traumatic death by hanging after her neck became wedged in a gap between a gate and a wall.



Newborn monkeys are violently separated from their fiercely-protective mothers for sale to the pet trade.

quality.¹⁶⁴

- In 2014, Montgomery Zoo* in Alabama was cited by the USDA for failure to provide veterinary care to a newborn rhino who staff observed was not nursing. The calf was not separated, monitored, or offered supplemental feeding and subsequently died.¹⁶⁵
- In 2014, Zooworld* in Florida was cited by the USDA for failure to feed a veterinarian-approved diet to adult big cats and cubs, failure to provide adequate environmental enrichment to a solitary lemur, failure to provide a sufficient public safety barrier around a kangaroo enclosure, and housing two newly acquired tiger cubs at locations that had not been inspected and approved.¹⁶⁶
- In 2014, citing substandard conditions and failure to demonstrate that a proposed movie project would enhance the propagation or survival of endangered tigers, the U.S. Fish & Wildlife Service denied Myrtle Beach Safari's* (a.k.a. T.I.G.E.R.S.) application to export and re-import 18 tigers to and from Mexico.¹⁶⁷
- 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.¹⁶⁸
- In 2013, Zooworld* in Florida was cited by the USDA for:¹⁶⁹
 - 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.
 - 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.

Insufficient, untrained, and unqualified staff

- In 2014, Bearizona* in Arizona was cited by the USDA for allowing an unqualified employee to administer anesthesia to a river otter.^{170,171}
- Gulf Breeze Zoo* in Florida was cited by the USDA in 2014 after an untrained and unsupervised intern allowed the escape, and subsequent death, of a short-tailed opossum.¹⁷²
- 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



This capuchin monkey, found dead, was apparently poisoned by the careless placement of rat bait.



A sick lamb who went untreated for a week thrashed and writhed in pain for more than 40 minutes before he finally died.

- employee to care for all the animals at the facility.¹⁷³
- Citing Wild Wilderness Safari's† inadequate facilities, inexperienced staff, and inability to prevent hybridization or aggressive interactions between species, in 2011 the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of primates, big cats, and other animals at the Arkansas facility.¹⁷⁴
- 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.¹⁷⁵
- Citing Florida-based NGALA's (a.k.a. Close-up Creatures)* inexperienced staff, the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of big cats in 2010.¹⁷⁶
- Following the deaths of approximately 25 animals in a 9-month period at Animal Source Texas‡, a USDA inspector wrote on a 2010 inspection report, “Current animal care personnel do not have experience working with the exotic species brokered through this facility. This could be a contributing factor to the high number of animal deaths this facility has experienced ...”¹⁷⁷

Financial stability and succession planning

- 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 *Animal Finders' Guide*, a publication that caters to the pet trade (see Appendix 3).¹⁷⁸ After the zoo moved out, the property owner claimed the zoo had caused more than \$100,000 in damage.¹⁷⁹
- Zooworld* in Florida, which keeps more than 100 animals including 10 big cats, 2 bears, 44 primates, and 2 giraffes on a 5.4-acre property, lost nearly \$77,000 in 2013. The zoo was sold for \$900,000 to a new owner in December 2014. Despite the zoo's long history of Animal Welfare Act violations, the new owner reduced staff by nearly half.¹⁸⁰
- 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.¹⁸¹



This mandrill bled to death just hours after the owner observed, and then ignored, a fresh wound inflicted by a cage-mate.



This tiger cub had access to an exposed electrical outlet with no face plate, posing a risk of electrocution.

- 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 2009.¹⁸²

Inadequate space

- York's Wild Kingdom* in Maine was cited by the USDA in 2015 for failure to provide minimum space to capybaras, a semi-acquatic species who were not given access to a pool during winter months.¹⁸³
- In 2015, the Clark County zoning commission ordered Lion Habitat Ranch* in Nevada to immediately halt breeding operations, new animal acquisitions, and public contact with lion cubs. The 6-acre backyard menagerie houses 46 lions, a giraffe, ostriches, and emus, which are more animals than its special use permit allows.^{184,185}
- Nevada-based Dirk Arthur† was cited by the USDA in 2013, and again in 2014, for failure to provide minimum space to big cats who were being exhibited at a casino.^{186,187}
- The Montgomery Zoo* in Alabama 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.¹⁸⁸
- Catoctin Zoo* in Maryland 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 an off-exhibit area.¹⁸⁹
- Buddy Jordan's† NBJ Zoological Park in Texas 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.¹⁹⁰
- 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.^{191,192}
- Citing Louisiana's Zoo of Acadiana's (a.k.a. Zoosiana)* inadequate space and lack of cage furnishings, in 2009 the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of primates, big cats, and other animals.¹⁹³

Disposing of animals in harmful and irresponsible ways

- 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



This elephant is used for rides and other public contact, despite a history of aggressive behavior. Elephants are highly social, yet she is housed alone.



This bear at Tregembo Animal Park in North Carolina, managed by Sheri Tregembot, went without adequate veterinary care for severe facial lesions.⁷⁷

numerous serious violations of the Animal Welfare Act.^{194,195}

- ZAA co-founder Jim Fouts† was exposed in a *60 Minutes* piece for selling endangered antelope at an auction where animals may end up at canned hunt facilities.¹⁹⁶
- Tanganyika* sent snow leopards and lemurs to Zoological Wildlife Conservation Institute in Oregon, a private menagerie with a lengthy list of Animal Welfare Act violations that include knowingly giving false information to a USDA inspector, declawing exotic cats, failure to obtain requisite health certificates for 13 primates who were transported across state lines, and allowing unsafe public contact with primates.^{197,198,199}
- Buddy Jordant 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.^{200,201}
- Bearizona* in Arizona transferred a black bear to Lee Greenly, owner of Minnesota Wildlife Connections, who had previously allowed a customer to illegally kill a captive-reared black bear contained in a 3-acre enclosure with a bow-and-arrow.²⁰² Greenly also pleaded guilty to two felony counts of aiding hunters to kill wild bears at baiting stations that he maintained illegally inside a national wildlife refuge. Greenly's USDA license was revoked for more than a dozen violations, including failure to provide adequate veterinary care and mishandling animals.²⁰³
- Zooworld* in Florida placed a “free to good home” classified ad for a 7-year-old cougar in *Animal Finders’ Guide*, a publication that caters to the exotic pet trade (see Appendix 3).²⁰⁴
- 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.^{205,206} Both facilities had been repeatedly cited by the USDA for failing to provide animals with veterinary care.^{207,208}
- 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.^{209,210,211}
- Living Treasures Animal Park† in Pennsylvania sent a 4-week-old tiger to Plumpton Park Zoo 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

“[The ZAA is] an advocacy group for private (animal) owners that does not represent the national or international zoo and aquarium profession.”

Steve H. Taylor, director,
Cleveland Metroparks Zoo⁷⁸

“Most of these [ZAA facilities] are what I refer to as ‘roadside menageries.’”

Mark Reed, director,
Sedgwick County Zoo⁷⁹

associated with an improper diet.^{212,213}

- Tiger World† in North Carolina sent two tigers to Conservators’ Center† in North Carolina with the knowledge that they would be sent to an unstable environment at the Baghdad Zoo while Iraq was embroiled in military conflict and many citizens were without access to basic necessities.²¹⁴

Unprofessional conduct

- In 2015, two animal care directors at Six Flags* in California filed a wrongful termination lawsuit when they were fired in apparent retaliation after complaining “repeatedly that crumbling infrastructure, poor water quality, improper diets, overmedication, improper surgical procedures, abusive training techniques, insufficient salt in the tanks and other compliance issues were endangering the health of the animals, and in some cases endangering employees and the public.”²¹⁵
- In 2015, Wildlife World Zoo* was cited by the USDA for concealing areas that contained regulated species from the inspector. The zoo’s deputy director, on multiple inspections, told the inspector that no regulated species were housed near the garbage dump, when in fact many animals were kept in that area and the inspector found conditions that violated the Animal Welfare Act.²¹⁶
- 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 as well as possession of ketamine, a controlled substance.^{217,218,219}
- 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 low 60s, and party-goers consumed concessions without paying for them and left the grounds littered with trash.²²⁰ In September 2014, Martinez was fired from the Washington Park Zoo* and was subsequently hired by Natural Bridge Zoo† in Virginia.^{221,222}
- 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

“You can’t just rearrange the letters and expect it to have the same meaning. ... We [the AZA] are recognized by governments all over the world as setting the standard for zoos.”

Steven Feldman, AZA, Senior Vice President of External Affairs⁸⁰

- was a member of the ZAA board of directors.^{223,224}
- 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.²²⁵
- 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-slaughter 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.^{226,227}

USDA Enforcement Actions

- In 2016, the USDA issued an official warning against Zooworld* in Florida for repeated failure to provide adequate veterinary care, repeated failure to adequately clean and sanitize primate cages, repeated failure to maintain cages, and inadequate public safety barriers.²²⁸
- In 2015, the USDA fined Zoological Wildlife Foundation* in Florida \$1,313 after a tiger bit a member of the public on the hand, causing serious bodily injury.²²⁹
- In 2015, the USDA issued an official warning against Cougar Mountain Zoo* in Washington for failure to provide veterinary care to an emaciated reindeer.²³⁰
- In 2015, the USDA issued an official warning against Wright Park Zoo* in Kansas for failure to provide clean, dry bedding to wolf-dogs during bitterly cold temperatures and repeated failure to maintain enclosures in good repair.²³¹
- In 2014, the USDA fined Montgomery Zoo* in Alabama \$8,107 for the escape of a tiger and a hyena from poorly maintained cages, a barn fire that killed two goats, allowing unsupervised contact with animals in the petting zoo, and failure to repair rusty primate cages.²³²
- In 2014, the USDA fined Two Tails Ranch* in Florida \$857 after an elephant attacked a visitor who was taking photos of the elephant. The woman was hospitalized for months with life-threatening injuries. Facility owner Patricia Zerbinit failed to report the incident to authorities.^{233,234}
- In 2014, the USDA issued an Official Warning against Nevada-based Dirk Arthur† for housing a snow leopard in a flimsy, rusty cage with broken welds that may not contain the animal and leaving a collar and chain on a caged bobcat, which became entangled on a bolt and created an obvious hazard for the bobcat.^{235,236}

- In 2013, the USDA issued an Official Warning against Triple D Game Farm* in Montana for subjecting a 2-month old tiger to declawing—a procedure that “can cause ongoing pain, discomfort, or other pathological conditions” in violation of veterinary care regulations.^{237,238}
- In 2013, the USDA fined Zooworld* in Florida \$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.²³⁹
- 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.²⁴⁰
- In 2013, the USDA issued an Official Warning against Wildlife World Zoo* in Arizona 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.²⁴¹
- 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.²⁴²
- 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.^{243,244}
- 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.^{245,246}
- 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.^{247,248,249}
- 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.²⁵⁰
- 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.²⁵¹
- In 2011, the USDA fined Panther Ridge* in Florida, owned by Judy Berenst†, \$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.²⁵²
 - In 2011, the USDA fined Tiger World in North Carolina, owned by Lea Jaunakait†, \$2,571 for a tiger escape.²⁵³
 - In 2011, the USDA issued an Official Warning against Six Flags* in New Jersey for the escape of two baboons.²⁵⁴
 - In 2010, the USDA issued an Official Warning against Hemker Zoo* in Minnesota 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.²⁵⁵
 - In a 2009 USDA administrative court proceeding, Mario Tabraue†, owner of Zoological Wildlife Foundation*, admitted to providing falsified documents and making false statements to the USDA while helping an unlicensed individual acquire a tiger from Myrtle Beach Safari*.²⁵⁶

*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.

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