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March 12, 2014

VIA EMAIL AND FACSIMILE

Elizabeth Pannill, D.V.M.
Western Region
Animal Care, APHIS-USDA
Building B, Mailstop #3W11
2150 Centre Avenue
Fort Collins, CO 80526-8117
Phone: (970) 494-7478
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Email: acwest@aphis.usda.gov

Re: First Appeal of Inspection Report (Inspection I.D. 65141438420403)[1]

Dear Dr. Pannill:

On behalf of our client, SeaWorld Of Texas ("SeaWorld") (Customer I.D. 4858, Certificate 74-C-0180), we write to appeal the Inspection Report you issued on March 6, 2014 regarding an inspection you conducted of SeaWorld's park on March 5, 2014 (the "Inspection Report," attached hereto). As discussed below, SeaWorld disputes the allegation in the Inspection Report that SeaWorld violated APHIS' regulation found at 9 C.F.R. § 2.131(d)(2). Accordingly, SeaWorld requests that you issue a new Inspection Report which deletes the erroneous allegation.

[1] Please note that this response, including the Inspection Report, is protected from disclosure under FOIA and SeaWorld reserves all its rights under the statute. In the event that any person seeks to obtain this appeal letter or the Inspection Report discussed herein under FOIA, SeaWorld requests that it be notified and be given ample opportunity to object and take whatever necessary action to protect its rights against any such disclosure.

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Factual Background

As a preliminary matter, we note that at SeaWorld the safety and well-being of the animals, staff and visitors are of utmost importance. SeaWorld provides thousands of safe interactions between its guests and animals each day, and incidents like the one alleged in the Inspection Report are few and far between. As a factual matter, all necessary and appropriate safety precautions were taken at the time of the alleged incident referenced in the Inspection Report. Indeed, SeaWorld had three responsible, knowledgeable and readily identifiable employees present at the dolphin exhibit at the time of the alleged incident, which occurred when there were not "large crowds" as alleged in the Inspection Report (see below). Neither the guest nor the dolphin were in any danger at any point during the interaction. In fact, after the alleged incident the guest stayed at SeaWorld's park to visit other attractions, and the dolphin, which did not suffer any injury or adverse health effects, required no treatment.

The Inspection Report

In the Inspection Report, you state:

> The public is allowed to touch the dolphins at one exhibit pool. There are usually 2- 3 knowledgeable employees present to monitor the interactions at this pool. Recently, a member of the public was nipped on the hand by a dolphin while attempting to touch the animal. There is concern that with large crowds, 2- 3 employees can not properly monitor all the interactions with the animals. The number of knowledgeable employees must be increased to assure the safety of the animals and the public.

Based on these statements, you cite SeaWorld for a violation of 9 C.F.R. § 2.131(d)(2). As discussed below, SeaWorld believes this alleged violation is erroneous, and should be removed from the Inspection Report, based not only on the facts outlined above, but on the law as discussed below.

APHIS Does Not Regulate Matters of Public Safety

Your citation is based on the allegation that "a member of the public [allegedly] was nipped on the hand by a dolphin while attempting to touch the animal." Although APHIS' regulations on their face refer to "public" safety, the Animal Welfare Act ("AWA") does not, in fact, grant the Secretary of Agriculture, or his designee, APHIS, the right to regulate public safety.

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This is clear from a number of sources including a leading case dealing with Section 2.131 of the APHIS regulations, *In re: The International Siberian Tiger Foundation, et al.*, 2002 WL 234001 (U.S.D.A. 2002).[2] In that case, the USDA Judicial Officer agreed with an argument made by the respondent exhibitioner that the AWA only covers the humane treatment of animals, but does *not* cover public safety. The Judicial Officer explained that although "section 2.131(b)(1) of the Regulations (9 C.F.R. § 2.131(b)(1)) [] provides that exhibited animals must be handled in a manner that assures not only their safety but also the safety of the public," this section "is directly related to the humane care and treatment of *animals* and within the authority granted to the Secretary of Agriculture under the Animal Welfare Act." 2002 WL 234001 at *17 (emphasis added). In other words, according to the Judicial Officer, the *sole* basis for the Secretary (or APHIS Inspectors) to even consider the safety of the public is *only* with respect to the potential impact upon "the humane care and treatment of animals." The issue for APHIS is what potential adverse consequences there may be for animals when interacting with the public. The AWA – and thus the APHIS regulations – simply do not concern public safety by itself.

Later in his opinion, the Judicial Officer confirmed this understanding of the AWA. He did so by reversing the earlier decision of the Chief Administrative Law Judge ("ALJ"), who had apparently misunderstood Complainant's arguments and had erroneously held that a violation of the handling regulation can be based on mere evidence that a member of the public had been bitten. The Judicial Officer explained that the occurrence of a bite by itself was *not* a basis to find that a violation of the handling regulation had occurred:

> The record clearly establishes that Complainant views the bites and other injuries sustained by people who had close encounters with Respondents' animals as the consequence of Respondents' violations of the Regulations. I find nothing in Complainant's filings indicating that Complainant takes the position that Respondents' animals' bites constitute violations of the Regulations, *and I do not adopt the Chief ALJ's statement that Complainant's rationale for alleging a violation in this proceeding is that Respondents were in compliance with section 2.131(b)(1) of the Regulations (9 C.F.R. § 2.131(b)(1)) until people were bitten.*

2002 WL 234001 at *23 (emphasis added).

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[2] Also available at: http://www.dm.usda.gov/oaljdecisions/vol61/Vol61_at_53.htm.

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In short, based on the AWA and the opinion of the Judicial Officer in *In re: The International Siberian Tiger Foundation, et al.*, there is and was no basis for your citation of SeaWorld for a deficiency or violation of Section 2.131 on the basis of what alleged injuries may or may not have been sustained by public contact with dolphins at SeaWorld. Moreover, because there is no evidence that any dolphin's welfare was jeopardized in connection with the alleged "nip" of a member of the public, there was and is no basis for SeaWorld's citation for the violation of 9 C.F.R. § 2.131(d)(2).

In Any Event, SeaWorld Did Not Violate 9 C.F.R. § 2.131(d)(2)

9 C.F.R. § 2.131(d)(2) provides: "A responsible, knowledgeable, and readily identifiable employee or attendant must be present at all times during periods of public contact." Thus, the regulation does not require that any specific number of qualified employees or attendants be present. In any event, SeaWorld had three such persons present during the interaction, which was both a reasonable and sufficient number under the circumstances. Accordingly, SeaWorld did not commit any violation of 9 C.F.R. § 2.131(d)(2) by virtue of the number of attendants present.[3]

Moreover, as noted, SeaWorld's employees present at the dolphin exhibit otherwise met the criteria identified in 9 C.F.R. § 2.131(d)(2): These employees were responsible, knowledgeable, and outfitted in readily identifiable, SeaWorld-issued uniforms. In sum, SeaWorld was, and is, fully in compliance with 9 C.F.R. § 2.131(d)(2).[4]

* * *

[3] Indeed, SeaWorld has more qualified employees present during the interactive dolphin exhibit than the regulation technically requires – the regulation only requires that ***a*** (*i.e.*, a single) qualified employee or attendant be present at all times during periods of public contact. Of course, SeaWorld reasonably adjusts the number of its employees available depending on the number of guests at the exhibit. However, the Inspection Report's requirement that "the number of knowledgeable employees must be increased" – *i.e.*, to deal with "large crowds" – is a vague, ambiguous and unenforceable standard in any case.

[4] Because SeaWorld is not in violation of 9 C.F.R. § 2.131(d)(2), and because – as confirmed by undersigned counsel's telephone call with Dr. Tami Howard, APHIS Veterinary Medical Officer, on March 11, 2014 – the corrective action demanded by the Inspection Report is stayed during the pendency of this appeal, and SeaWorld need not take any corrective action pursuant to the Inspection Report at this time.

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KELLEY DRYE & WARREN LLP

For the reasons set forth above, SeaWorld appeals the citation in the Inspection Report, reserves all its rights, and requests that APHIS issue an amended Inspection Report which deletes the erroneous allegation.

Sincerely,

/s/ Elizabeth C. Johnson

Ira T. Kasdan
Elizabeth C. Johnson
Counsel to SeaWorld

cc: Laurie Beechner
Barbara Heffernan

MAR 11 2014

USDA

United States Department of Agriculture
Animal and Plant Health Inspection Service

65141438420403 EPANNILL insp_id

Inspection Report

Sea World Of Texas
10500 Sea World Dr
San Antonio, TX 78251

Customer ID: **4858**
Certificate: **74-C-0180**
Site: 001
SEA WORLD OF TEXAS

Type: ROUTINE INSPECTION
Date: Mar-05-2014

2.131 (d) (2)

HANDLING OF ANIMALS.

The public is allowed to touch the dolphins at one exhibit pool.. There are usually 2- 3 knowledgeable employees present to monitor the interactions at this pool . Recently,a member of the public was nipped on the hand by a dolphin while attempting to touch the animal. There is concern that with large crowds, 2- 3 employees can not properly monitor all the interactions with the animals. The number of knowledgeable employees must be increased to assure the safety of the animals and the public.
CORRECT BY : 3-12-14

The inspection and exit briefing was conducted with Sea World of Texas curators and veterinarians

Prepared By: Elizabeth Pannill, DVM, USDA

ELIZABETH PANNILL, D.V.M. USDA, APHIS, Animal Care — **Date:**

Title: VETERINARY MEDICAL OFFICER Inspector 4018 — Mar-06-2014

Received By:

SENT BY EMAIL — **Date:**

Title: VP ZOOLOGICAL OPERATIONS — Mar-06-2014

MAR 11 2014

USDA

United States Department of Agriculture

Animal and Plant Health Inspection Service

Animal Care
Western Region

2150 Centre Avenue
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Fort Collins, CO
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acwest@aphis.usda.gov

April 11, 2014

Attorney Elizabeth C Johnson
Washington Harbour, Suite 400
3050 K Street, NW
Washington, DC 20007

Attorney Johnson,

I have received and reviewed your letter of March 12, 2014 wherein you are appealing the USDA animal welfare inspection report of March 5, 2014. The inspection report was re-evaluated for appropriateness and consistency with the regulations and standards as contained in Title 9 of the Code of Federal Regulations, Chapter 1, Subchapter A (9CFR). I also have had discussions with the Animal Care inspectors who conducted the inspection. Upon careful review of your letter, I do not find sufficient justification to remove the cited incident from the report.

The facility was cited for **Handling of Animals**. ***2.131 (d)(2). A responsible, knowledgeable, and readily identifiable employee or attendant must be present at all times during periods of public contact.***

Based on interviews with facility staff conducted by the inspectors regarding the incident, at the time of the incident involving public contact there were 2 readily identifiable, responsible persons present or in the area when the child was bitten by the dolphin. Since the occurrence of this incident, the number of staff has been increased to 3 persons. Please know that efforts to correct the staffing situation are appreciated. Nonetheless a bite did occur according to staff, therefore the inspection report will be amended. This incident would be more appropriately and accurately cited under ***Handling of Animals, Section 2.131 (c)(1)*** of the Regulation.

Animals that harm the public have a greater risk of being harmed themselves. The regulatory requirement is that animals used in regulated activities be handled so that there is minimal risk of harm to the animal and minimal risk of harm to the public assuring public safety. This is directly related to the humane care and treatment of animals and is indeed within the authority granted to the Secretary of Agriculture under the Animal Welfare Act.

For these reasons, I can only grant an amending of the inspection report to cite the incident under the more appropriate section of the law. You should receive a copy of the amended report within the next two weeks.

An Equal Opportunity Provider and Employer

If you wish to appeal this determination to the Regional Director, please know that if we do not hear from you within 30 days, the amended inspection report will be posted at that time. Thank you for your interest in the welfare of animals.

Should you have any questions pertaining to this letter, or any other issues concerning the Animal Welfare Act and regulations, please do not hesitate to contact us at the address above.

Sincerely,

Tami L Howard

Tami L. Howard, DVM
Supervisory Animal Care Specialist

CC: Dr. Elizabeth Pannill, VMO
Dr. Mary E Moore, VMO
Dr. Elizabeth C Meek, Assistant Regional Director

USDA

United States Department of Agriculture

Animal and Plant Health Inspection Service

Animal Care
Western Region

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May 27, 2014

Elizabeth C. Johnson | Kelley Drye & Warren
Washington Harbour, Suite 400
3050 K Street, NW, Washington, DC 20007-5108

Dear Ms. Johnson,

I write in reply to your further appeal of the citation on the inspection report of March 5, 2014, issued to Sea World of Texas. Inasmuch as the USDA does not possess sufficient evidence to prove that a violation of Section 2.131(c)(1) took place when a member of the public was bitten while present at the dolphin pool on February 22, 2014 (i.e., contact between the public and the dolphins is allowed at this pool by Sea World of Texas), the citation will be removed from the inspection report and an amended inspection report will be issued. You should receive the amended inspection report within two weeks of receiving this letter.

Thank you for your interest in the welfare of animals.

Sincerely,

Robert M. Gibbens, DVM
Director, Western Region
USDA, APHIS, Animal Care

An Equal Opportunity Provider and Employer

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AFFILIATE OFFICE
MUMBAI, INDIA

May 8, 2014

VIA EMAIL AND FACSIMILE

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Fax: (970) 494-7461
Email: acwest@aphis.usda.gov

Re: First Appeal of Inspection Report dated April 23, 2014 (Inspection I.D. 104140922050961) (hereafter the "Second Inspection Report") [1] [2]

Dear Dr. Pannill:

On behalf of our client, SeaWorld Of Texas ("SeaWorld") (Customer I.D. 4858, Certificate 74-C-0180), we write to appeal the Second Inspection Report you issued on April 23, 2014[3] regarding an inspection you conducted of SeaWorld's park on March 5, 2014. The Second Inspection Report is attached hereto. As discussed below, SeaWorld disputes the

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1 This is the first appeal relating to this Inspection Report, which, in turn, is an amended Report issued after APHIS retracted the one dated March 5, 2014 (ID # 65141438420403) (hereafter the "First Inspection Report") pursuant to the letter from Tami L. Howard, APHIS, D.V.M., to Elizabeth Johnson, counsel for SeaWorld, dated April 11, 2014.

2 Please note that this response, including the Second Inspection Report, is protected from disclosure under FOIA and SeaWorld reserves all its rights under the statute. In the event that any person seeks to obtain this appeal letter or the Inspection Report discussed herein under FOIA, SeaWorld requests that it be notified and be given ample opportunity to object and take whatever necessary action to protect its rights against any such disclosure.

3 *See* note 1, above.

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allegation in the Second Inspection Report that now claims that SeaWorld violated APHIS' regulation found at 9 C.F.R. § 2.131(c)(1), instead of, as originally claimed in the First Inspection Report, 9 C.F.R. § 2.131(d)(2). Because SeaWorld did not violate 9 C.F.R. § 2.131(c)(1), or any APHIS regulation for that matter, SeaWorld requests that you issue a new Inspection Report which deletes the erroneous allegation.

Factual Background

As a preliminary matter, we note that at SeaWorld the safety and well-being of the animals in its care, its guests and its employees are of utmost importance. SeaWorld provides thousands of safe interactions between its animals and guests each day, and incidents like the one alleged in the Second Inspection Report are few and far between. As a factual matter, all necessary and appropriate safety precautions were taken at the time of the alleged incident referenced in the Second Inspection Report. Indeed, SeaWorld had three responsible, knowledgeable and readily identifiable employees present at the dolphin exhibit at the time of the alleged incident, which occurred when there were not "large crowds" as alleged in the First Inspection Report, but which erroneous allegation is not repeated in the Second Inspection Report. Neither the guest nor the dolphin was in any danger at any point during the interaction. In fact, after the alleged incident the guest stayed at SeaWorld's park to visit other attractions, and the dolphin, which did not suffer any injury or adverse health effects, required no treatment.

The First Inspection Report

In the First Inspection Report, you stated:

> The public is allowed to touch the dolphins at one exhibit pool. There are usually 2- 3 knowledgeable employees present to monitor the interactions at this pool. Recently, a member of the public was nipped on the hand by a dolphin while attempting to touch the animal. There is concern that with large crowds, 2- 3 employees cannot properly monitor all the interactions with the animals. The number of knowledgeable employees must be increased to assure the safety of the animals and the public.

Based on these statements, you cited SeaWorld for a violation of 9 C.F.R. § 2.131(d)(2). As SeaWorld discussed in its appeal of the First Inspection Report, and as you now apparently agree given the issuance of the Second Inspection Report claiming a different violation, SeaWorld never violated 9 C.F.R. § 2.131(d)(2).

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The Second Inspection Report

In full, the Second Inspection Report, which alleges the violation of Section 2.131(c)(1), states:

> The public is allowed to touch the dolphins at one exhibit pool. Recently, there was an incident at the dolphin pool where a childs [sic] hand was nipped by a dolphin. During the exhibition, any animal must be handled so there is minimal risk to the animal and the public. The Facility must assure the safety of the regulated animal and the public. To be corrected from this day forward.
>
> The inspection and exit briefing was conducted with SeaWorld of Texas curators and veterinarians.

Notably, the Second Inspection Report does not recommend or dictate any particular corrective action.

Discussion

APHIS Does Not Regulate Matters of Public Safety

Like the First Inspection Report, the Second Inspection Report predicates a violation based on the erroneous premise that APHIS can regulate public safety under the Animal Welfare Act ("AWA"). As we noted in the first appeal, the AWA does not, in fact, grant the Secretary of Agriculture, or his designee, APHIS, the right to regulate public safety.

This is clear from a number of sources including a leading case dealing with Section 2.131 of the APHIS regulations, *In re: The International Siberian Tiger Foundation, et al.*, 2002 WL 234001 (U.S.D.A. 2002).[4] In that case, the USDA Judicial Officer agreed with an argument made by the respondent exhibitioner that the AWA only covers the humane treatment of animals, but does *not* cover public safety. The Judicial Officer explained that although "section 2.131(b)(1) of the Regulations (9 C.F.R. § 2.131(b)(1)) [] provides that exhibited animals must be handled in a manner that assures not only their safety but also the safety of the public," this section "is directly related to the humane care and treatment of *animals* and within the authority granted to the Secretary of Agriculture under the Animal Welfare Act." 2002 WL 234001 at *17 (emphasis added). In other words, according to the Judicial Officer, the *sole* basis for the

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4 Also available at: http://www.dm.usda.gov/oaljdecisions/vol61/Vol61_at_53.htm .

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Secretary (or APHIS Inspectors) to even consider the safety of the public is *only* with respect to the potential impact upon "the humane care and treatment of animals." The issue for APHIS is what potential adverse consequences there may be for animals when interacting with the public. The AWA – and thus the APHIS regulations – simply do not concern public safety by itself.

Later in his opinion, the Judicial Officer confirmed this understanding of the AWA. He did so by reversing the earlier decision of the Chief Administrative Law Judge ("ALJ"), who had apparently misunderstood Complainant's arguments and had erroneously held that a violation of the handling regulation can be based on mere evidence that a member of the public had been bitten. The Judicial Officer explained that the occurrence of a bite by itself was *not* a basis to find that a violation of the handling regulation had occurred:

> The record clearly establishes that Complainant views the bites and other injuries sustained by people who had close encounters with Respondents' animals as the consequence of Respondents' violations of the Regulations. I find nothing in Complainant's filings indicating that Complainant takes the position that Respondents' animals' bites constitute violations of the Regulations, *and I do not adopt the Chief ALJ's statement that Complainant's rationale for alleging a violation in this proceeding is that Respondents were in compliance with section 2.131(b)(1) of the Regulations (9 C.F.R. § 2.131(b)(1)) until people were bitten.*

2002 WL 234001 at *23 (emphasis added).

In short, based on the AWA and the opinion of the Judicial Officer in *In re: The International Siberian Tiger Foundation, et al.*, there is and was no basis for your citation of SeaWorld for a deficiency or violation of Section 2.131 because there is no evidence that any dolphin's welfare was jeopardized in connection with the alleged "nip" of a member of the public. The mere fact that a "nip" may have occurred simply is not sufficient to cite SeaWorld.[5]

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[5] We note that Dr. Howard, in her letter dated April 11, 2014, does not address the *Siberian Tiger* case at all. Thus, her reasoning that SeaWorld committed a violation of Section 2.131(c)(1) because "a bite did occur," Letter at 1, contradicts *Siberian Tiger* and her conclusion that a new citation should be issued is incorrect and of no effect.

Dr. Howard, in her Letter, also states that: "Animals that harm the public have a greater risk of being harmed themselves." While that may be true, the fact of the matter here is that the dolphin was not harmed. Whether or not a member of the public in this instance may have been harmed simply is not relevant in the absence of any injury or threat of harm to the dolphin. In the end, APHIS has no authority over this incident which did not implicate, or relate to, "humane

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In Any Event, SeaWorld Did Not Violate 9 C.F.R. § 2.131(c)(1)

As relevant here, and as the Second Inspection Report clearly notes, Section 2.131(c)(1) requires handling during public exhibition so that there is "minimal risk of harm to the animal and the public." "Minimal" does not mean "no" risk. Thus, the regulation does *not* require SeaWorld to *eliminate* all risk of injury (and of course such a requirement would be impossible to meet), and injuries still may occur even when (as here) SeaWorld takes all precautions necessary to render the risk of such injuries "minimal."

Nonetheless, APHIS relies solely on the fact that an injury (to the public, and not to any animal) allegedly occurred as evidence that SeaWorld failed to minimize the risk of harm. The Second Inspection Report fails to identify a single fact that suggests SeaWorld was not doing its part to render risk of injury "minimal" at the time of the alleged incident. In fact, SeaWorld was complying with all standard operating procedures designed to minimize risk of injury at the time the alleged "nip" occurred. For instance, in compliance with Section 2.131(d)(2), SeaWorld had several "responsible, knowledgeable, and readily identifiable employee[s] or attendant [s] . . .present at all times during periods of public contact" in order to ensure the safety of the animals.

The fact that during the public contact – which is expressly allowed by the regulation as the Second Inspection Report even acknowledges[6] – a "nip" may have occurred does not mean that SeaWorld failed to handle the dolphins in the proper manner. *See Siberian Tiger*, above, 2002 WL 234001 at *23 (holding that fact that a bite occurred is not, in and of itself, evidence of a violation of the regulation). The regulation simply does not require that SeaWorld insure against any and all risks – *i.e.*, no matter how small or inconsequential they may be. SeaWorld acted (as it always does) reasonably and responsibly; it violated no regulation.

No Corrective Action is Needed

As noted above, the Second Inspection Report does not identify anything specific that SeaWorld allegedly did to violate the regulation, and therefore does not set forth any specific corrective action for SeaWorld to take. That is not surprising because as a matter of fact there is no corrective action that SeaWorld can take to ensure that there *never* would be a "nip" during public contact with the dolphins. Accordingly, the admonition in the Second Inspection Report

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care and treatment of animals [which, as Dr. Howard further wrote] is indeed within the authority granted to the Secretary of Agriculture under the Animal Welfare Act."

6 The Second Inspection Report, like the First one states the outset: "The public is allowed to touch the dolphins at one exhibit pool."

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that the alleged violation must be "corrected from this day forward" is vague and unenforceable, and thus null and void, as a matter of law.[7]

* * *

For the reasons set forth above, SeaWorld appeals the citation in the Inspection Report, reserves all its rights, and requests that APHIS issue an amended Inspection Report which deletes the erroneous allegation.

Sincerely,

/s/ Elizabeth C. Johnson

Ira T. Kasdan
Elizabeth C. Johnson
Counsel to SeaWorld

Cc (by email): Laurie Beechner, Esq.
Barbara Heffernan
Tami Howard, D.V.M.

[7] In any event, due to the pendency of this appeal, in accordance with APHIS' practice – as previously confirmed by undersigned counsel's telephone call with Dr. Tami Howard, APHIS Veterinary Medical Officer, on March 11, 2014 – the corrective action demanded by the Inspection Report is stayed and SeaWorld need not take any corrective action at this time.

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USDA

United States Department of Agriculture
Animal and Plant Health Inspection Service

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Inspection Report

Sea World Of Texas
10500 Sea World Dr
San Antonio, TX 78251

Customer ID: **4858**
Certificate: **74-C-0180**
Site: 001
Sea World of Texas

Type: ROUTINE INSPECTION
Date: Mar-05-2014

2.131 (c) (1)

HANDLING OF ANIMALS.

The public is allowed to touch the dolphins at one exhibit pool.Recently , there was an incident at the dolphin pool where a childs hand was nipped by a dolphin. During public exhibition, any animal must be handled so there is minimal risk to the animal and the public.The facility must assure the safety of the regulated animal and the public. To be corrected from this day forward.

The inspection and exit briefing was conducted with Sea World of Texas curators and veterinarians.

Prepared By: Elizabeth Pannill, D.V.M.
ELIZABETH PANNILL, D.V.M. USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL OFFICER Inspector 4018
Date: Apr-23-2014

Received By:
SENT BY EMAIL
Title: VP ZOOLOGICAL OPERATIONS
Date: Apr-23-2014

MAY 19 2014