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Via Mail and Email

January 24, 2018

Phyllis Fong, Inspector General
USDA, Office of Inspector General
Room 117-2 Jamie Whitten Bldg.
1400 Independence Avenue SW
Washington, DC 20250
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**RE: Request that OIG Investigate the U.S. Department of Agriculture's
Animal and Plant Health Inspection Service's Animal Procurement
from Ruby Fur Farm (AWA License No. 42-B-0052)**

Dear Inspector General Fong:

I am writing to you on behalf of the Animal Legal Defense Fund (ALDF) – a public interest organization dedicated to protecting the lives and advancing the interests of animals through the legal system. ALDF, representing its thousands of members and supporters, requests that the Office of Inspector General promptly and thoroughly investigate USDA's procurement contracts with Ruby Fur Farm – a Class B licensee that has chronically and egregiously violated the Animal Welfare Act.

OIG was created by the Inspector General Act of 1978 to curtail mismanagement and inefficient uses of resources at federal agencies.¹ Specifically, the Act authorizes OIG to conduct investigations, review agency management to provide policy direction, and recommend policies to promote efficiency and prevent waste and abuse in agency operations.² OIG has conducted numerous procurement oversight audits of various federal agencies. OIG has clear authority to investigate USDA's procurement contracts here.

¹ See 5 U.S.C. Appx. § 1.

² 5 U.S.C. Appx. §§ 4, 6.

As detailed by several news articles³ and more than a dozen recent USDA inspection reports,⁴ Ruby Fur Farm has willfully, egregiously, and continuously violated the AWA. Ruby Fur Farm's chronic violations affect at least 1,375 animals, including ferrets, raccoons, and skunks.⁵ The Farm's inhumane and unlawful conditions include, *inter alia*:

- Facilities that are unsanitary and in disrepair – with “excessive” amounts of pests, broken wires and rusted cages, build-up of wet excreta, dirt and maggots on the floor and in cages, and food contaminated with fecal waste. Inspection reports also documented multiple instances of dead animals being left to rot in the same cages as living animals.⁶
- Failure to provide veterinary care to animals that had conditions such as flesh protruding from the anus, animals with bloody diarrhea, animals with visible abrasions that were unable to use their limbs (including one skunk with “significant” swelling on her right foot, with skin that had broken open, “exposing red tissue and a thick, yellow discharge”), and animals who had sores that had “worn through the entire nose area, exposing bone and moist, red tissue in the nasal cavity.”⁷
- Lack of care for at least 50% of the raccoons – who were exhibiting abnormal repetitive behaviors in response to stressors including pacing, weaving/bobbing, and wall-walking. These abnormal behaviors were likely due to stressors including: lack of total space, lack of the ability to hide from other individuals or humans, overcrowding, incompatibility of animals, and over- or under-stimulation in their environment.⁸
- Improper handling of animals by housing approximately 290 raccoons in a building with such high ambient temperature and humidity that nine raccoons were in “serious heat distress” and other raccoons were displaying behaviors such as panting and drooling and had an increased respiratory rate. These

³ Attached as Exhibit A: David Pitt, Animal Rights Groups Demand Action Against Iowa Fur Farm, Chicago Tribune, Nov. 10, 2017, available at <http://www.chicagotribune.com/news/sns-bc-us--fur-farm-iowa-20171110-story.html>; Katarina Zimmer, USDA Buys Animals from Farm It Reported for Animal Welfare Abuses, The Scientist, Nov. 14, 2017, available at <http://www.the-scientist.com/?articles.view/articleNo/50950/title/USDA-Buys-Animals-from-Farm-It-Reported-for-Animal-Welfare-Abuses/>.

⁴ See Exhibit B.

⁵ 96 animals in the 12.07.2016 report; 55 animals in the 02.22.2017 report; 352 animals in the 06.12.2017 report; 292 animals in the 07.19.2017 report; 290 animals in the 07.21.2017 report; and 290 animals in the 07.25.2017.

⁶ Attachments to Exhibit B, *passim*; Nov. 17, 2015 report; Dec. 7, 2016 report.

⁷ Attachments to Exhibit B, *passim*; Nov. 17, 2015 report; Feb. 17, 2016 report.

⁸ Attachments to Exhibit B, Feb. 17, 2016 report.

animals were also lying on their sides, backs, and abdomens with their legs splayed out. Due to the temperature, the animals were reluctant to move, lethargic, and not alert to activity around them.⁹

USDA inspection reports clearly demonstrate the Farm's failure to comply with regulations in the AWA subchapter. Accordingly, ADLF has submitted a contemporaneous complaint to USDA requesting revocation of the Farm's license.¹⁰ However, by choosing to procure animals from Ruby Fur Farm, USDA undermines its own enforcement actions, fails to ensure compliance with the AWA, and perpetuates the same animal mistreatment and neglect it is tasked with curing. In short, USDA's procurement contracts with the Farm amount to a significant breach of the public trust by an agency entrusted with protecting animals regulated under the AWA.

USDA's decision to contract with the Farm also violates applicable regulations governing federal acquisitions and contracts. Pursuant to Federal Acquisition Regulation (FAR) and USDA's own Agriculture Acquisition Regulation (AGAR),¹¹ USDA must only purchase from responsible contractors – *i.e.*, contractors that have a satisfactory performance record, without series deficiencies in contract performance, including failure to meet the quality requirements of the contract.¹² Contractors for the government must have “a satisfactory record of integrity and business ethics.”¹³ If a contractor commits any offense “indicating a lack of business integrity or business honesty that seriously and directly affects the[ir] present responsibility,” that contractor may be suspended.¹⁴ A contractor may also be debarred for any cause “of so serious or compelling a nature that it affects the present responsibility of the contractor.”¹⁵

The Farm's conduct reflects an utter disregard for the AWA and USDA's enforcement of the AWA. This constitutes serious or compelling misconduct that calls into question the responsibility of the Farm. Thus, to comply with FAR – and to

⁹ Attachments to Exhibit B, July 20, 2017 report, July 25, 2017 report.

¹⁰ Attached as Exhibit B.

¹¹ AGAR implements and supplements the FAR. The regulations cover the same areas as the FAR but have more specific guidelines on certain topics.

¹² 48 C.F.R. 9.103 (citing 9.104-3(b) and subpart 42.15). Subpart 42.15 establishes responsibilities for recording and maintaining contractor performance information including past performance information (e.g., record of conforming to requirements and to standards of good workmanship and integrity and business ethics). It requires that past performance evaluations be prepared “at least annually and at the time the work under a contract or order is completed.”

¹³ 48 C.F.R. 9.104-1(d). Contractors must also (e) “have the necessary organization, experience . . . and operational controls, and technical skills . . . (including, as appropriate, such elements as production control procedures, property control systems, quality assurance measures, and safety programs applicable to materials to be produced . . .)” and (f) “have the necessary production, construction, and technical equipment and facilities . . .”

¹⁴ 48 C.F.R. 9.407-2. Causes for suspension.

¹⁵ 48 C.F.R. 9.406-2(c).

conform with its own enforcement actions – USDA should not enter into procurement contracts with the Farm.

Furthermore, by choosing to procure animals from Ruby Fur Farm, USDA undermines the validity of its animal research studies.¹⁶ Procurement of chronically mistreated and abused animals also constitutes waste and abuse of taxpayer money invested in those animals and surrounding research. Research animals acquired from the Farm introduce an uncontrolled variable of animal neglect into the studies USDA conducts using taxpayer funding. This undermines the integrity of USDA research findings and results in easily avoidable taxpayer waste. Since fiscal year 2007, USDA has spent \$67,525 on contracts with the Farm.¹⁷ Given the USDA inspection history of the Farm, USDA has thus directly wasted almost \$70,000 in taxpayer funds. USDA has also wasted many times that amount through wasted research hours and resources – all because it chose to use animals USDA knows have been mistreated and abused, and possess a compromised health status at the time of procurement.

In light of these disturbing revelations, OIG should immediately and thoroughly investigate USDA's negligent oversight of the Farm and its improper procurement contracts with the Farm. OIG should further exercise its authority¹⁸ to recommend USDA (1) terminate of all current procurement contracts with the Farm, (2) refrain from entering into future contracts with the Farm, and (3) verify humane sourcing/standards for all animals who it procures for use in research.

Thank you for your attention to this matter, and please feel free to contact us for further consultation on this very important public interest issue.

Sincerely,



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ANIMAL LEGAL DEFENSE FUND
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CC: Sonny Perdue, Secretary of Agriculture
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¹⁶ USDA's own policies require humane care of animals for use in research. *See* <https://www.afm.ars.usda.gov/ppweb/pdf/130-04.pdf>

¹⁷<http://government-contractors.insidegov.com/1/175318/Ruby-Fur-Farm-Inc;>
<https://govtribe.com/vendor/ruby-fur-farm-inc-new-sharon-ia>

¹⁸ *See* 7 C.F.R. § 2610 *et seq.*

Exhibit A

David Pitt, *Animal Rights Groups Demand Action Against Iowa Fur Farm*,
Chicago Tribune, Nov. 10, 2017

Katarina Zimmer, *USDA Buys Animals from Farm It Reported for Animal
Welfare Abuses*, The Scientist, Nov. 14, 2017

Animal rights groups demand action against Iowa fur farm

By **DAVID PITT**

Associated Press

NOVEMBER 10, 2017, 11:00 AM | DES MOINES, IOWA

Federal inspectors have repeatedly ordered a southeast Iowa fur farm to improve the grim living conditions for ferrets, foxes, raccoons and skunks it sells to government laboratories and pet stores.

Many of the animals have been forced to live in sweltering heat or maggot-infested filth, sometimes with decomposing carcasses in their cages, officials found over the last two years.

So far no charges or enforcement action has been taken against the Ruby Fur Farm near New Sharon, 65 miles (105 kilometers) southeast of Des Moines. However, animal rights groups are calling for rescue of the animals, revocation of the farm's federal license and fines for neglect.

[U.S. Department of Agriculture](#) inspectors documented the most recent problems when they returned to the farm seven times between December and August after finding suffering animals.

A building housing 290 raccoons reached 100 degrees in July, with many of the animals panting and drooling and 26 in "severe heat distress," according to a July 21 inspection report.

Reports from 2015 show injured or sick raccoons as well as skunks and ferrets that didn't receive veterinary treatment. In one cage a skunk was found living with its dead cage-mate.

A December 2016 report noted: "One dead, decomposing, headless juvenile ferret was found incorporated into the fecal material buildup on the wire floor in the corner of the cage," which also housed a live adult and six juvenile ferrets.

Federal contracts show that even as USDA inspectors were writing up the reports about the farm's treatment of raccoons, the agency was signing contracts to buy animals from the company for research. It spent nearly \$30,000 in June and December of 2015 and in July 2016.

The business since 2007 received more than \$67,000 from USDA contracts to provide skunks, raccoons, and foxes. USDA has expansive research enterprises with divisions that focus on food safety, animal health and food production improvements. One of the contracts indicates raccoons were obtained by a USDA lab in Colorado focusing on wildlife diseases, and another noted young foxes would be used as "research models."

The farm is licensed to Randy Ruby as a registered federal dealer by the USDA Animal and Plant Health Inspection Service, and it holds state permits as an animal dealer and a pet shop.

Ruby declined to discuss the reports with The Associated Press when reached by telephone. He referred calls to The Cavalry Group, a Missouri-based animal business advocacy organization to which he is a member.

Its president, Mindy Patterson, said some of the USDA inspectors' claims are exaggerated and when there has been an issue Ruby has addressed them immediately.

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Randy Ruby's farm being targeted and harassed tested agriculture practices to ensure the health and as inhumane treatment of animals by these

groups who have nothing but an emotion-based agenda."

The farm's website says it has been in business for more than 65 years and raises "our animals with tender, loving care, and we can ship them anywhere in the world."

Michael Budkie, executive director of Stop Animal Exploitation Now, an Ohio-based nonprofit that monitors U.S. research and animal holding facilities, has called for the termination of the fur farm's federal animal dealer's license and rescue of the animals.

In an Oct. 16 letter to Robert Gibbens, a veterinarian and the USDA's director of Animal Welfare Operations based in Colorado, Budkie asked the agency to fine Ruby Fur Farm. He said inspection reports clearly demonstrate "a total disregard for the health and well-being of these animals."

USDA spokesman R. Andre Bell confirmed the agency has discussed the farm with an animal rights group but declined to say whether it was considering enforcement action or terminating the license. He also declined to discuss whether USDA's purchased of animals from the fur farm had any impact on its enforcement of animal welfare regulations.

The Iowa Department of Agriculture, which has issued state permits for the farm to operate as a pet shop and registered federal dealer, has no enforcement action pending, said spokesman Dustin Vande Hoef. The agency can revoke the permits if it were to find standard of care issues but it has received no complaints, he said.

Any animal neglect charges must come from a law enforcement officer under Iowa law.

Mahaska County Sheriff Russ VanRenterghem said he accompanied a USDA inspection team to the fur farm three or four times in July.

"I don't see any violations," he said, describing the farm's owners as "very reputable, very good people."

Iowa is ranked the second worst in the nation for animal welfare behind Kentucky, according to the Animal Legal Defense Fund's annual rankings released in January.

Iowa enforcement is weak because with a few exceptions animal neglect is not considered a felony, and laws defining adequate shelter conditions are unclear, the group said.

"In general if I was picking a state to be an animal in, Iowa would be very far down my list," said David Rosengard, a staff attorney for the group's criminal justice program. "I could be neglected. I could be starved. I could be abandoned and the person who did that wouldn't face the sort of repercussions they would have to deal with in a lot of other states."

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USDA Buys Animals from Farm It Reported for Animal Welfare Abuses

The federal agency has so far not taken any enforcement action against Ruby Fur Farm.

By Katarina Zimmer | November 14, 2017

◀ 37

◀ 20



ISTOCK, RMARNOLD

The same federal agency that had ordered a fur farm in Iowa to improve the appalling living conditions for the animals it keeps simultaneously spent tens of thousands of dollars on purchasing animals from the company for research, the *Associated Press* reports.

The [United States Department of Agriculture](#) (USDA), which is responsible for enforcing regulations on animal welfare, had repeatedly ordered [Ruby Fur Farm](#) to improve the living conditions and treatment for the raccoons, skunks, ferrets, and foxes it sells as “unusual pets” as well as for scientific research. Several animal rights groups have called for fines to be charged and the farm’s federal license to be revoked.

Although the USDA has documented problems in the treatment and keeping of animals in the farms, the agency has not demanded fines or taken any enforcement action so far.

According to the *Associated Press*, a USDA report from December 2016 noted: “One dead, decomposing, headless juvenile ferret was found incorporated into the fecal material buildup on the wire floor in the corner of the cage,” in which seven other ferrets were housed.

Ruby Fur Farm has received nearly \$70,000 in USDA contracts since 2007. According to the *Associated Press*, documents show that the USDA was purchasing animals from Ruby Fur Farm at the same time as agency inspectors were writing reports on the maltreatment of the farm’s animals. The USDA will likely use the animals in its research facilities, which focus on food safety, animal health, and wildlife diseases.

USDA spokesman R. Andre Bell declined to discuss with the *Associated Press* whether the agency’s enforcement of animal welfare regulations was affected by its purchase of animals from the farm.

Ruby Fur Farm declined requests to discuss the reports with the *Associated Press*, although its president says that some of the claims about the treatment of its animals have been exaggerated. On the farm’s website, it states: “We raise our animals with tender, loving care, and we can ship them anywhere in the world. With more than 65 years of experience, we have the knowledge to provide you with healthy, unique animals that are sure to delight your customers.”

Tags

[USDA](#), [regulation](#), [raccoon](#), [fur trade](#), [federal agency](#), [animal welfare](#) and [animal rights](#)

Exhibit B
USDA Complaint



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Via Mail and Email

January 24, 2018

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RE: Request that USDA Revoke Ruby Fur Farm's Class B license (AWA License No. 42-B-0052) and Cease Procuring Animals from the Farm

Dear Secretary Perdue, Administrator Shea, and Director Gibbens:

I am writing to you on behalf of the Animal Legal Defense Fund (ALDF)—a public interest organization dedicated to protecting the lives and advancing the interests of animals through the legal system. ALDF, representing its thousands of members and supporters, requests that USDA exercise its authority to revoke Ruby Fur Farm's Class B dealer license and issue the maximum penalty allowable against the Farm due to its willful, egregious, and continuous violations of the AWA. USDA's own inspection reports over the past two years demonstrate AWA violations in such frequency and numbers that revocation of the Farm's license is necessary. In the alternative, ALDF requests that USDA decline to renew the Farm's license. USDA should also immediately cease purchasing animals from the Farm for use in research.

The AWA requires dealers, like the Farm, to have licenses from USDA. USDA may terminate a license at any time—not just during the license renewal process, “for any reason that an initial license application may be denied pursuant to § 2.11.”¹ USDA may deny an initial license when the applicant violates the AWA regulations² or any

¹ 9 C.F.R. § 2.12.

² 9 C.F.R. § 2.11 Denial of initial license application (citing 9 C.F.R. Chapter I, Subchapter A – Animal Welfare).

federal, state, or local laws. For severe violations, the AWA also provides for a financial penalty in the amount of \$10,000 per violation, per animal.³

USDA can also decline to renew a facility's license. Regulations provide for the Administrator to consider a facility's compliance with all "Federal, State, or local laws or regulations pertaining to the . . . welfare of animals"⁴ when processing an application for AWA license renewal. Under the AWA, applicants for license renewal must certify that they are in compliance, and will continue to comply, with the law.⁵ Failure of a facility to comply with the provisions, regulations, or standards⁶ of the AWA constitutes grounds for denial of a license.⁷

For the past several years, inhumane and unlawful conditions have proliferated at the Farm. USDA itself has documented the alarming situation – filing approximately 14 negative inspection reports against Ruby Fur Farm in the past two years alone. These USDA inspection reports clearly demonstrate the Farm's failure to comply with AWA regulations. The inhumane conditions at the Farm affect at least 1,375 animals, including ferrets, raccoons, and skunks.⁸ These animals experience severe neglect and cruelty. The Farm's willful, egregious, and repeated violations of the AWA over the past two years are summarized below:

- March 4, 2015: **Failure to provide access to APHIS Officials**⁹
- August 17, 2015: 1 **Direct**¹⁰ NCI¹¹
 - Failure to Provide Veterinary Care

³ 7 U.S.C. § 2149.

⁴ 9 C.F.R. § 2.11(a)(6).

⁵ 9 C.F.R. § 2.2(b).

⁶ *Inter alia*, regulations found at 9 C.F.R. Part 2 governing licensing, registration, attending veterinarian and adequate veterinary care (including the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries), records, handling of animals (including regulations relating to climatic conditions presenting a threat to an animal's health or well-being); standards found at 9 C.F.R. Part 3 governing the humane handling, care, treatment, and transportation of warmblooded animals other than dogs, cats, rabbits, hamsters, guinea pigs, nonhuman primates, and marine animals (including standards relating to facilities and operating standards, animal health such as feeding, watering, and sanitation).

⁷ 7 U.S.C. § 2143.

⁸ 96 animals in the 12.07.2016 report; 55 animals in the 02.22.2017 report; 352 animals in the 06.12.2017 report; 292 animals in the 07.19.2017 report; 290 animals in the 07.21.2017 report; and 290 animals in the 07.25.2017 report.

⁹ Attached as Exhibit 1.

¹⁰ "Direct," means that at the time of the inspection the violation was "having a serious or severe adverse effect on the health and well-being of the animal, or ha[d] the high potential to have that affect in the immediate future." APHIS Animal Welfare Inspection Guide at 2-10, *available for download at* https://www.aphis.usda.gov/animal_welfare/downloads/Animal-Care-Inspection-Guide.pdf.

¹¹ Attached as Exhibit 2.

- Raccoon with injured limb was clearly in pain and was seen limping.
 - Skunk with creamy green discharge coming from her face showed extreme lethargy and did not move the entire time she was observed – indicating a variety of medical problems and illness. This skunk was dead two days later.¹²
 - Ferret with swelling on his neck was coughing during the inspection.
- Facilities Unsanitary and in Disrepair
 - “Numerous” ferret and raccoon enclosures with broken wires protruding into the enclosures.
 - “Numerous” ferret enclosures with gaps or holes where the wire in the floor was broken.
 - Bent metal, ripped edges, and a gap that could trap a limb in a raccoon enclosure.
 - Raccoon enclosure had standing water mixed with animal waste collecting under and around it, with an excessive number of flying insects and other pests on the affected areas.
 - Numerous ferret, raccoon, and skunk enclosures had a build-up of wet excreta, dirt, and maggots on the floor.
 - Excessive amount of feces in the wire portion of raccoon enclosures, some covering 50% to 75% of the available floor space and in a pile “about 4 inches deep.”
 - Excessive amount of feces in ferret enclosures with mold growing on the surface.
 - Raccoon and ferret buildings had excessive flies on the feed and in and around the enclosures.
 - Unsanitary Food
 - Three enclosures where ferret food was placed on a rusted and dirty metal platform.

¹² USDA Inspection Report, Aug. 20, 2015, attached as Exhibit 3.

- Two self-feeders for ferrets had caked, moldy food.
 - Several enclosures had the food on the part of the wire floor that was contaminated with feces.
- November 17, 2015: 1 **Repeat, Direct NCI; 2 Repeat**¹³
 - Failure to Provide Veterinary Care
 - Skunk had pink flesh protruding from his anus – indicating problems such as prolapsing anus, parasite problems, or other intestinal problems.
 - Raccoon with visible abrasions on his injured leg was unable to put his foot down during the time he was observed.
 - Two raccoons had wounds on their snouts that had “worn through the entire nose area, exposing bone and moist, red tissue in the nasal cavity.”
 - Ferret with swelling on his chin and lower lip.
 - Facilities Unsanitary and in Disrepair
 - Dead skunk found in an enclosure with a live skunk.
 - “Numerous” ferret and raccoon enclosures with broken wires that protruded into the enclosures.
 - Several skunk enclosures with holes on the walls with broken or missing wire.
 - Animals seen loose in the indoor building and an alley outdoors.
 - Broken lights in the ferret building.
 - Skunk nesting box with a build-up of wet excreta covering the entire floor surface.
- February 17, 2016: 1 **Repeat Direct NCI; 2 Direct NCI; 2 Repeat**¹⁴
 - Failure to Provide Veterinary Care

¹³ Attached as Exhibit 4.

¹⁴ Attached as Exhibit 5.

- At least 50% of the raccoons were exhibiting abnormal repetitive behaviors in response to stressors including pacing, weaving/bobbing, and wall-walking. These abnormal behaviors continued for the entire duration the APHIS inspectors were in the building. Stressors included: lack of total space, lack of the ability to hide from other individuals or humans, overcrowding, incompatibility of animals, and over- or under-stimulation in their environment.
- 27 animals were found in need of veterinary care.
- Skunk with a non-weight bearing foot had severely swollen digits and scabbing. This skunk was not eating his food.
- Skunk with “significant” swelling on her right foot, which was warm to the touch. The foot had skin that had broken open, “exposing red tissue and a thick, yellow discharge.”
- Ferret with clear discharge coming from her right eye, which had a cloudy area and a red outline on the cornea.
- Ferret with yellow discharge around his nostrils exhibited respiratory problems.
- Raccoon had visible diarrhea mixed with bright red bloody fluid in his enclosure and had apparent loss of appetite.
- Ferret had swelling under his jaw, indicating infection, trauma, dental disease, cancer, or other medical problems.
- Ferret had a large area of moist, red skin over his shoulders and center of his back, with dark crusts and hair loss.
- Ferret had hair loss on his ears, with dark and thickened exposed skin.
- Ferret had an eye abnormality that made her eyeball not visible. There was brown staining around her uneven eyelids with a “fleshy mass” in place of her eye.
- Ferret with missing ear flap and dark discharge in her ear canal.
- Seven ferrets with a white opacity or color visible in one or both eyes.

- At least 10 ferrets with a clear discharge or dried discharge around their eye.
 - Facilities Unsanitary and in Disrepair
 - “Several enclosures [were] in disrepair.”
 - At least 15 ferret enclosures had broken wires and nails protruding into the enclosures.
 - Excessive accumulation of fresh and old excreta beneath the enclosures in both ferret buildings.
 - Under the enclosures were numerous live maggots, fly pupa, and hatched pupa casings in the piles of excreta.
 - Significant accumulation of hair, organic matter, and other debris along the cage supports.
 - Dirt flooring in the raccoon building had an excessive buildup of fresh and old excreta that had a “white moldy appearance.”
 - Two ferrets housed outside were consistently shivering, and the wooden nesting boxes contained little to no bedding material. The ambient temperature was 40 degrees Fahrenheit.
 - Skunk nesting box and fox enclosures had a buildup of wet excreta covering most or the entire floor surface.
 - Failure to provide adequate space
 - Raccoon enclosures inadequately small and did not allow raccoons to sit up on their haunches or stand on their hind legs – both of which are normal postural adjustments for raccoons.
 - Enclosures did not allow for climbing or other species-type behaviors.
 - 50% of the raccoons were exhibiting abnormal repetitive behaviors due to the inadequate space.
- July 18, 2016: **Failure to provide access to APHIS Officials**¹⁵

¹⁵ Attached as Exhibit 6.

- November 8, 2016: **Failure to provide access to APHIS Officials**¹⁶
- December 7, 2016: **3 Repeat**¹⁷
 - Failure to Provide Veterinary Care
 - Skunk had hair loss over 50% of her back, legs, and abdomen. The skin in these areas was thickened, scaly, and cracked.
 - Facilities Unsanitary and in Disrepair
 - Two dead ferrets were found in separate ferret enclosures with live ferrets.
 - One dead, decomposing, headless juvenile ferret was found “incorporated into the fecal material buildup on the wire floor in the corner of the cage” with seven other ferrets in the same enclosure.
 - Several enclosures had broken wires or sharp points. Ferret enclosures affecting over 60 ferrets had broken wires in the flooring or gaps between the wall and the floor.
 - Excessive accumulation of fecal material in the backs of many ferret cages.
- February 22, 2017: **4 Repeat**¹⁸
 - Failure to Provide Veterinary Care
 - Male skunk had a hairless area with reddened and dark brown crusty material – closer examination revealed numerous small black insects crawling throughout the affected area.
 - Female skunk had extreme hair loss on her body – with areas nearly devoid of hair. She also had a crusty dark brown material on the affected areas.
 - Raccoon with abnormal hair loss on left flank also had no hair at all on his tail.

¹⁶ Attached as Exhibit 7.

¹⁷ Attached as Exhibit 8.

¹⁸ Attached as Exhibit 9.

- Facilities Unsanitary and in Disrepair
 - Raccoon and ferret enclosures had buildup of old, moldy excrement, thick layers of dried food waste, and buildup of new feces in the corners.
 - Fox enclosures had nails protruding through the wooden braces – creating sharp points of contact for the animals.
 - Metal water receptacles fastened with wires created sharp points in ferret enclosures.
 - Plastic shelving for ferrets fastened with wire created sharp points.
 - Buildup of caked food material and food waste in and around the machine used to prepare food.
- May 17, 2017: **Failure to provide access to APHIS Officials**¹⁹
- June 12, 2017: **4 Repeat**²⁰
 - Improper Handling of Animals
 - Raccoon building had a high ambient temperature and humidity, causing multiple raccoons to display behaviors such as panting and lying on their sides and abdomens with their legs splayed out.
 - Facilities Unsanitary and in Disrepair
 - Multiple skunk and ferret enclosures have broken wires creating sharp points in the animals’ space, gaps in which animals could get caught, and detached bottoms and sides of cages.
 - Enclosures in the raccoon building had an excessive accumulation of fresh and old excreta beneath the enclosures, with “numerous live maggots” present in the piles of excreta. There was also “a significant accumulation of hair, organic matter, and other debris” along the cage supports.
 - Excessive accumulation of feces in the back corners of ferret enclosures that were “infested with live maggots and the ferrets were seen stepping in the material and maggots.”

¹⁹ Attached as Exhibit 10.

²⁰ Attached as Exhibit 11.

- Ferret building and skunk building both had an excessive number of flies.
- July 19, 2017: **2 Direct Repeat** (focused inspection)²¹
 - Failure to Provide Veterinary Care
 - Raccoon appeared lethargic and had “no response” when approached by the APHIS inspector.
 - Raccoon had white-yellowish discharge from her eye, which had a “dark line of material” underneath it.
 - Improper Handling of Animals
 - Raccoon building had a high ambient temperature and humidity, approximately 123.3 degrees Fahrenheit. Multiple raccoons were displaying behaviors such as panting and lying on their sides and abdomens with their legs splayed out.
- July 20, 2017: **1 Direct Repeat** (focused inspection)²²
 - Improper Handling of Animals
 - Raccoon building had a high ambient temperature and humidity, approximately 119.4 degrees Fahrenheit. “Numerous” raccoons were displaying behaviors such as panting and drooling and had an increased respiratory rate. These animals were also lying on their sides, backs, and abdomens with their legs splayed out.
- July 25, 2017: **1 Direct Repeat** (focused inspection)²³
 - Improper Handling of Animals
 - Raccoon building, with approximately 290 raccoons, had a high ambient temperature and humidity, approximately 108.0 degrees Fahrenheit. Nine raccoons were in “serious heat distress.” Raccoons were displaying behaviors such as panting and drooling and had an increased respiratory rate. These animals were also lying on their sides, backs, and abdomens with their legs splayed out. The

²¹ Attached as Exhibit 12.

²² Attached as Exhibit 13.

²³ Attached as Exhibit 14.

animals were reluctant to move, lethargic, and not alert to activity around them.

- August 21, 2017: **1 Direct Repeat; 3 Repeat**²⁴
 - Failure to Provide Veterinary Care
 - Lethargic and weakened ferret had numerous engorged ticks on her head and body.
 - Facilities Unsanitary and in Disrepair
 - Ferret building's enclosures had broken wires with sharp points. Enclosures also had broken flooring with holes.
 - Skunk enclosures had broken wires with sharp points, exposed nails, and holes in the enclosures.
 - Fox enclosures had rotten wood with exposed nails, broken floor supports, and broken wires.
 - Water receptacles were coated with green algae or contained an excessive number of flies floating in the water.
 - Numerous enclosures had an excessive buildup of old excrement, some of which was dried and covered in a gray material.
 - Heavy accumulation of flies on fox and ferret food.

In short, Ruby Fur Farm routinely fails to meet AWA standards, as USDA documents continually reflect. Yet disturbingly, USDA not only regularly renews the Farm's license and refrains from revoking the license – USDA in fact *contributes* to the Farm's business by purchasing animals from the Farm for use in research. By choosing to procure animals from Ruby Fur Farm, USDA undermines its own enforcement actions, fails to ensure compliance with the AWA, and perpetuates the same animal mistreatment and neglect it is tasked with curing. Moreover, USDA risks undermining the validity of its animal research studies²⁵ and violating Federal Acquisition Regulation²⁶ by procuring animals from Ruby Fur Farm. USDA should cease purchasing animals from the Farm and should revoke the Farm's license.

²⁴ Attached as Exhibit 15.

²⁵ USDA's own policies require humane care of animals for use in research. See <https://www.afm.ars.usda.gov/ppweb/pdf/130-04.pdf>

²⁶ See 48 C.F.R. 9.103 (citing 9.104-3(b) and subpart 42.15).

As evidenced by the 14 inspections or attempted inspections by APHIS over the past two years alone, Ruby Fur Farm has committed countless egregious violations of the Animal Welfare Act. Renewal of the Farm's license is scheduled to occur on February 4, 2018. USDA should not allow Ruby Fur Farm – a chronic violator of the AWA – to continue abusing animals simply because it is a procurement source for USDA research. To do so would perpetuate the harms that USDA's enforcement is designed to address, fail to ensure the humane treatment of the animals at issue, and undermine the very purpose of the AWA.

Instead, USDA should revoke or decline to renew the Farm's license in order to effect the AWA's intended purpose of protecting animals from inhumane treatment.²⁷ Regardless of which course of action USDA takes, USDA should immediately cease purchasing animals from the Farm for use in research. Thank you for your attention to this important matter.

Sincerely,



Amanda M. Howell
ANIMAL LEGAL DEFENSE FUND
ahowell@aldf.org
(707) 795-2533 ext. 1037

²⁷ Animal Welfare Act 7 U.S.C. § 2131 *et seq.*; Disciplinary 7 C.F.R. § 1.130-1.151.

Exhibit 1
APHIS Inspection Report
March 4, 2015



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ATTEMPTED INSPECTION

Date: Mar-04-2015

2.126 (b)

ACCESS AND INSPECTION OF RECORDS AND PROPERTY; SUBMISSION OF ITINERARIES.

A responsible adult was not available to accompany APHIS Officials during the inspection process at 1:30 p.m. on 03/04/2015.

Prepared By:

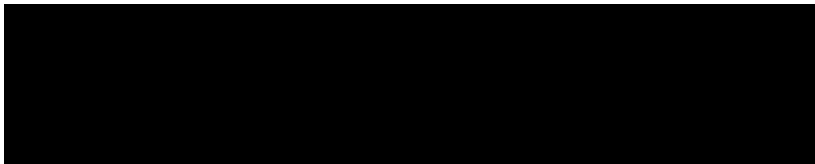
CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Mar-05-2015

Received By:



Title:

Date:
Mar-05-2015

Exhibit 2
APHIS Inspection Report
August 17, 2015



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ROUTINE INSPECTION

Date: Aug-17-2015

2.40 (b) (2)

DIRECT NCI

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

One cinnamon colored raccoon was seen limping on its right front leg. The animal held the leg up both while walking and while at rest. Altered gait or reluctance to use a limb is a sign of pain and can be caused by injury or other medical problems.

One black and white skunk was seen curled up in its nesting box and did not move the entire time it was observed. This lethargic behavior was unusual compared to all of the other skunks at the facility. There was also a creamy green discharge on the side of the animal's face. Lethargy is not expected in this species under these conditions as evidenced by the behavior of the other skunks. Lethargy can indicate a variety of medical problems and illnesses. A creamy green discharge can indicate infection or other medical problems.

One albino ferret was heard making a coughing noise during the inspection. This ferret had a swelling on the left side of the neck, under the chin. Coughing and any abnormal swelling can be caused by a variety of medical problems and can be painful.

The animals listed above must be examined by a licensed veterinarian in order to ensure that an accurate diagnosis is obtained and an appropriate treatment plan is developed and followed. This information, including the diagnosis, treatment and resolution of the condition, must be documented and made available to the inspector upon request.

To be corrected by end of business day on: August 19, 2015.

3.125 (a)

FACILITIES, GENERAL.

There are numerous ferret and raccoon enclosures with broken wires that protrude into the enclosures. Sharp, protruding metal points can cause injury to the animals

There are numerous ferret enclosures with gaps or holes where the wire in the floor is broken. These holes are large enough to possibly allow an animal to escape.

Prepared By:

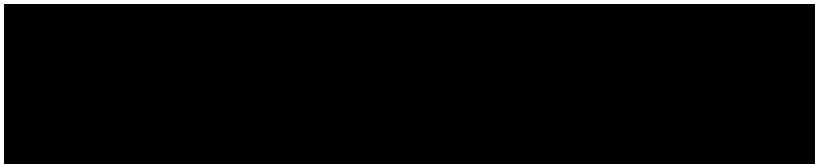
CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date: Aug-18-2015

Received By:



Title:

Date: Aug-18-2015



Inspection Report

There is a gap between the floor and wall along the length of one raccoon enclosure. The body weight of the animal when it runs along the enclosure wall causes the gap to widen can could cause injury if a limb becomes entrapped. There is bent metal flashing on the egress tunnel of one fox shelter. The bent metal has a ripped edge that is jagged and has some points, both of which can cause possible injury. The licensee must ensure that all housing facilities be structurally sound and maintained in good repair to protect the animals from injury and to contain the animals.

To be corrected by: August 25, 2015.

3.127 (c)

FACILITIES, OUTDOOR.

The outdoor facility housing the raccoons has areas of standing water on the dirt floor. The water is mixed with animal waste and is collecting under and around the enclosures. There is an excessive number of flying insects and other pests present on the affected areas. The licensee stated that when the animals are watered some on the water runs over the water receptacle and onto the floor where it starts pooling up. There's not an adequate drainage method in place to rapidly eliminate excess water. Improper drainage under and around the enclosures does not ensure a clean, dry environment which can lead to health hazards for the animals. A suitable method shall be provided to rapidly eliminate excess water from the housing area.

To be corrected by: October 17, 2015.

3.129 (b)

FEEDING.

There were three enclosures where the ferret food was placed on a rusted and dirty metal platform. There were two metal self feeders in ferret enclosures that contained small amounts of caked food that appeared to have mold growing on it. There were at least two enclosures where the ferret food was pushed off of the feeding platform onto the part of the wire floor that the ferrets were using as a toilet area. Food that is contaminated with fecal waste and other contaminants can cause decreased appetite and nutrition. The license must ensure that food receptacles be kept clean and sanitary and shall be placed to minimize food contamination.

To be corrected by: August 19, 2015.

3.131 (a)

SANITATION.

Cleaning of enclosures.
There were at least three ferret, three raccoon, and seven skunk nest boxes that had a build-up of wet excreta and dirt on the floor. Maggots were seen in the excreta of some of these nest boxes. At least four

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Received By:

Title:

Date:
Aug-18-2015



Inspection Report

raccoon enclosures had an excessive amount of feces on the wire floor portion of the enclosures. (Some covering 50 to 75% of the available floor space and some in a pile about 4 inches deep.) There were at least four ferret enclosures with an excessive build-up of feces with mold growing on the surface. Excessive excreta in primary enclosures can contribute to odors, insects and other pests, and can play a role in disease transmission. The licensee must ensure that excreta be removed as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

To corrected by: August 21, 2015.

3.131 (d)

SANITATION.

Pest control.

The raccoon and ferret building both have an excessive number of flies in the housing area. The flies are on the feed and in and around the enclosures containing ferrets and raccoons.

The presence of pests can lead to health hazards for the animals. The licensee must establish and maintain a safe and effective program for the control of flies and other pests.

To be corrected by: August 31, 2015.

The facility's surgical and veterinary care practices continue to be under review.

Inspection and exit briefing conducted with the licensee and Margaret Shaver, VMO.

Prepared By:

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CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Aug-18-2015

Received By:

Title:

Date:
Aug-18-2015

Exhibit 3
APHIS Inspection Report
August 20, 2015



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ROUTINE INSPECTION

Date: Aug-20-2015

This is a focused inspection to address the Direct non-compliant items listed under 2.40 (b)(2) on the August 17, 2015 inspection report.

The albino ferret and female cinnamon raccoon received veterinary care on August 19, 2015. The striped skunk in the outdoor housing area died prior to the veterinarian's visit.

Exit interview conducted with facility representative.

Prepared By:

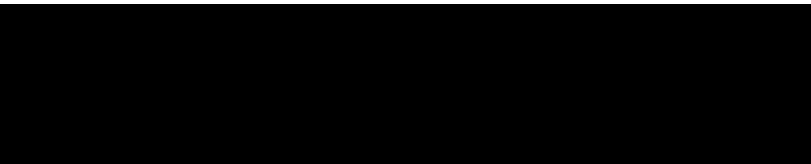
CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Aug-25-2015

Received By:



Title:

Date:
Aug-25-2015

Exhibit 4
APHIS Inspection Report
November 17, 2015



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001

Type: ROUTINE INSPECTION

Date: Nov-17-2015

2.40 (b) (2) REPEAT DIRECT NCI

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

A male, black and white skunk has a small amount of pink flesh protruding from his anus. This is consistent with problems such as prolapsing anus, parasite problems, or other intestinal problems. This condition can lead to damage of the exposed tissue, interfere with defecation, and cause discomfort.

One male, white raccoon was seen holding his right front leg off the ground consistently during the time it was observed. Abrasions were present on the top of the right foot. Alterations in gait can be associated with trauma or other medical problems and indicates discomfort.

Two raccoons in one enclosure both had wounds on the top of their snouts. The wounds have worn through the entire nose area, exposing bone and moist, red tissue in the nasal cavity. The licensee stated that he suspected these injuries were caused by another raccoon who he has since removed from the enclosure. Wounds such as these can be painful and lead to respiratory problems.

One ferret was observed to have a swelling on his chin and lower lip. Swelling in the mouth area can be caused by dental problems and a variety of other medical issues and can be painful.

The licensee states that he has not communicated with the attending veterinarian about the medical care of any of these animals. The animals listed above must be examined by a licensed veterinarian in order to ensure that an accurate diagnosis is obtained and an appropriate treatment plan is developed and followed. This information, including the diagnosis, treatment and resolution of the condition, must be documented and made available to the inspector upon request.

3.125 (a) REPEAT

FACILITIES, GENERAL.

Structural strength.

There are numerous ferret and raccoon enclosures with broken wires that protrude into the enclosures.

Prepared By:

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CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Nov-17-2015

Received By:

Title:

Date:
Nov-17-2015



Inspection Report

Sharp, protruding metal points can cause injury to the animals.

There are four skunk enclosures with holes on the walls where the wire is broken or missing. These holes are large enough to possibly allow an animal to escape.

There was one ferret enclosure with a hole in the wall where the wire was missing. A ferret was seen coming into the enclosure through this hole from the space between this enclosure and the next one. Also, during the inspection, two ferrets were seen out of enclosures, one in the indoor building and one in the alley way of one of the outdoor banks of enclosures. These animals were therefore not well contained. The licensee was able to capture the ferrets during the inspection and place them in an enclosure.

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

3.126 (c)

FACILITIES, INDOOR.

Lighting.

The rows of lights on one end of the indoor ferret building were not working during the inspection. The enclosures and the animals within them in this area were difficult to assess due to the lack of light. Lack of light interferes with the inspection process as well as the day to day cleaning of the enclosures and the daily observation of the animals. The licensee must ensure that indoor housing facilities have ample lighting by natural or/or artificial means. Such lighting shall be uniformly distributed and of sufficient intensity to permit routine inspection and cleaning.

To be corrected by: December 1, 2015.

3.131 (a)

REPEAT

SANITATION.

Cleaning of enclosures.

There is a wooden nesting box attached to a wire enclosure within the outdoor housing area. The box has a build-up of wet excreta covering the entire floor surface affecting one skunk.

Excessive excreta in primary enclosures can contribute to odors, insects and other pests, and can play a role in disease transmission. The licensee must ensure that excreta be removed as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

3.133

SEPARATION.

The remains of a skunk were found in an enclosure with another skunk. The licensee states that occasionally fights can occur that lead to the death of one of the skunks. Injuries were observed on the snouts of two raccoons in one enclosure. The licensee states he believed another raccoon (subsequently

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USDA, APHIS, Animal Care

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Inspector 6079

Nov-17-2015

Received By:

Title:

Date:

Nov-17-2015



Inspection Report

removed from the enclosure) caused the injuries. Incompatibility can lead to injury or death of the animals involved. The licensee must ensure that animals housed in the same primary enclosures must be compatible.

To be corrected by: November 18, 2015.

Inspection and exit briefing conducted with the licensee, Peggy Shaver, VMO and Kelly Maxwell, ACI.

Prepared By:

CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Nov-17-2015

Received By:

Title:

Date:
Nov-17-2015

Exhibit 5
APHIS Inspection Report
February 17, 2016



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001

Type: ROUTINE INSPECTION

Date: Feb-17-2016

2.40 (b) (2) REPEAT DIRECT NCI ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

27 animals were found in need of veterinary care at the time of inspection. This includes:

1. One male, albino skunk is observed holding up the right front foot. This animal is non-weight bearing at a walk and only occasionally puts weight on the foot when standing still. When removed from the cage, the outer two digits of the right front foot are very swollen and there is a rough scab on the edge of the foot above the last digit. This skunk's ration of food remains un-eaten on top of its enclosure. Swelling of limbs such as this can result from trauma, infection and a variety of medical problems and can be painful. The lack of appetite supports the likely possibility of pain and can also be present with infection and other medical problems.
2. One female, black and white skunk has a significant swelling on the bottom of the right hind foot extending just above the toes. There is a firm swollen area on the bottom of the foot that is approximately 2cm x 3 cm and is warm to the touch. The skin on the bottom of the foot has broken open exposing red tissue and a thick, yellow discharge. Problems such as this can result from trauma, infection and other medical problems and can be significantly painful.
3. One female, light sable ferret is observed squinting her right eye. There is a clear discharge in the fur around her eyelids and a small cloudy area with a red outline on the surface of the eye (cornea). Eye problems can be a result of trauma, infection, and other medical problems and can be painful.
4. One dark sable, male ferret is observed to be sneezing. This ferret has yellow discharge around his nostrils. Respiratory problems can result from infections, environmental conditions, and other medical problems. Without treatment these may progress and lead to unnecessary suffering.
5. One cinnamon colored raccoon in cage 204 has a pile of partially formed feces mixed with bright red bloody fluid under its enclosure. This animal's ration of food remains un-eaten on top of its enclosure. Diarrhea and loss of appetite can result from a variety of medical problems.
6. One dark sable ferret has a firm swelling under the right side of its jaw and extends into the neck approximately 3cm x 3cm. Swelling such as this in a ferret can result from problems such as infection,

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Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
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Received By:

Title:

Date:
Feb-18-2016



Inspection Report

trauma, dental disease, cancer and other medical problems and can be painful.

7. One sable, male ferret has a large area of moist, red skin over the shoulders and center of the back approximately 2in x 1 in. Dark crusts and hair loss are also present. Skin problems can result from trauma, infection, and a variety of other medical problems and can be painful.

8. One silver, white ferret has hair loss on the margins of his ears. The exposed skin is dark in color and thickened along the entire edge of both ears. Skin problems and hair loss can result from parasites, trauma, infection, and other medical problems.

9. One sable, female ferret has an abnormality with her right eye. The eyeball is not visible and there is a small amount of brown staining around the uneven eyelids. One of the eyelids has a fleshy mass that gives the appearance of a furry growth in place of the eye. The causes of this could range from simply not having an eyeball to having the eyeball obscured by infection, trauma, etc. Veterinary examination and diagnosis are necessary to determine the appropriate treatment plan.

10. One sable, female ferret has an irregular edge where the pinnae (ear flap) appears to be missing. There is a dark discharge in the ear canal. Ear problems such as this can be caused from trauma, infection, and other problems and can be painful.

11-17. There are 7 ferrets with a white opacity or color visible in one or both eyes. It is possible that this could be chronic condition such as cataract formation but other medical problems cannot be ruled out without a veterinary exam. The licensee stated that the attending veterinarian has examined some of the ferrets for eye problems but was unable to provide documentation and could not identify which animals had been evaluated. The licensee must provide documentation regarding medical conditions including the diagnosis, treatment and resolution. In the case of chronic, ongoing conditions, documentation should include symptoms or changes that indication re-evaluation of the condition is required.

18-27. There are at least 10 ferrets that have a clear discharge or dried discharge around the eyes. All of these animals were housed in the indoor buildings. Ocular discharge can be caused by both environmental factors and medical problems, and can indicate discomfort.

The animals listed above must be examined by a licensed veterinarian in order to ensure that an accurate diagnosis is obtained and an appropriate treatment plan is developed and followed. This information, including the diagnosis, treatment and resolution of the condition, must be documented and made available to the inspector upon request.

*** At least 50 percent of the raccoons are exhibiting abnormal repetitive (stereotypic) behaviors at the time of inspection. These animals were each moving with varying patterns, but the pattern shown is consistent for each affected animals. The patterns expressed included:

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USDA, APHIS, Animal Care

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ANIMAL CARE INSPECTOR

Inspector 6079

Feb-18-2016

Received By:

Title:

Date:

Feb-18-2016



Inspection Report

- Several raccoons were observed pacing. These animals were consistently quickly walking several steps, turning, and returning to the starting location. Generally, effected animals were consistently pacing along one enclosure wall although a few did turn and begin pacing at the opposite end of the enclosure when approached. This pacing behavior was exhibited consistently when observed for several minutes, and the path was generally only altered when another animal interfered or it was otherwise interrupted by noise or approaching.
- Several raccoons were observed weaving / bobbing. These animals were observed quickly shifting weight from one hind foot to the other while reaching with the forelimbs from one side to the other. Occasionally this was also seen in combination with movement of the head up and down. Generally this motion was facing outwards from the enclosure and several animals were observed rubbing their heads on the enclosure wires while preforming this motion. A few animals had areas of hair loss on the head which corresponded to the areas that they were rubbing on the wires as they repeated this behavior. This includes a dark color male raccoon in enclosure number 285 that has hair loss on the head over the right eye. The skin central to this hair loss has a central area that appears red-brown consistent with an abrasion. A male raccoon in enclosure 288 was observed weaving and also has areas of hair loss over both eyes, though the underlying skin appears normal on this animal.
- Several raccoons were observed wall walking. This behavior was often observed in conjunction with pacing, and animals were observed quickly walking along the kennel and then turning by partially extending their hind legs and walking their front end up the wall of the enclosure. The extension of the hind limbs is limited by the enclosure height (18in per the licensee).

Several individual animals were observed for 5-10 minutes each and the behavior continued generally without significant variation, though some animals shortened strides moving from pacing into weaving as time progressed. Animals continued these behaviors until interrupted such as by another animal entering their path or by noise. Raccoons were observed both cage-side and from a distance and were seen exhibiting these behaviors well before approached by inspectors or the licensee. These abnormal behaviors also continued for the entire duration that inspectors were in the building, even once they had left the immediate area of the particular enclosure. When asked about the behaviors, the licensee stated that is what raccoons do . Abnormal repetitive behaviors, often called stereotypies, can develop in response to many stressors including: lack of total space, lack of the ability to hide from other individuals or humans, overcrowding, incompatibility of animals, and over or under stimulation in their environment. Because these behaviors often develop in response to distress, they are important indicators of behavioral ill-health and require veterinary intervention to properly diagnosis the most likely causes and prevent farther deterioration by providing an appropriate treatment plan to address the stressor as well as the abnormal behavior. Correct by having the raccoons evaluated by the attending veterinarian for diagnosis of the cause of these behaviors and development of an appropriate treatment plan to address this issue. Written documentation the Attending Veterinarian s recommendations regarding alterations to cage space, provisions of hide areas, enrichment, and any other steps necessary to address this abnormality shall be maintained by the licensee for review by APHIS Officials. Additionally, the licensee shall maintain documentation of the implementation of these recommendations for review.

Prepared By:

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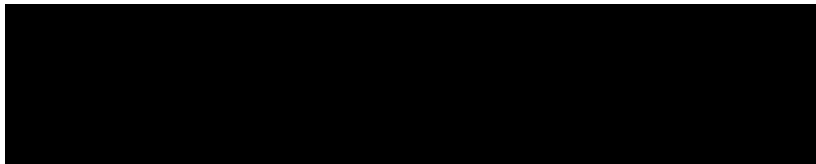
Title:

ANIMAL CARE INSPECTOR

Inspector 6079

Feb-18-2016

Received By:



Date:

Title:

Feb-18-2016



Inspection Report

3.125 (a) REPEAT

FACILITIES, GENERAL.

Several enclosures are in disrepair. There are at least 15 ferret enclosures with broken wires and nails that protrude into the enclosures. Sharp, protruding metal points can cause injury to the animals. Two wooden nesting boxes being used by ferrets are in disrepair. There are chewed and worn areas along the bottom half of the boxes that are creating openings large enough the ferrets could escape. The licensee must ensure that all housing facilities be structurally sound and maintained in good repair to protect the animals from injury and to contain the animals.

3.125 (d)

FACILITIES, GENERAL.

There is an excessive accumulation of fresh and old excreta beneath the enclosures located in both ferret buildings (worst in the east shed). Under the enclosures along the wall there are numerous live maggots, fly pupa, and hatched pupa casing present in the piles of excreta. Pupa casings are also present under the cages not currently in use and there are a large number of flies in the facility. There is a significant accumulation of hair, organic matter, and other debris along the cage supports in both ferret buildings. There is also an accumulation of dried raccoon and cat feces on the floor along the southeast corner of the building. The dirt flooring in the raccoon building has an excessive buildup of fresh and old excreta that has a white moldy appearance beneath and around the enclosures being used.

Excessive accumulations of animal waste in the housing area can lead to poor air quality, disease hazards and pest infestations. Poor air quality is linked to the development of health problems and many fumes, such as ammonia, can cause discomfort to animals and can lead to conditions such as respiratory and eye abnormalities. The licensee must remove animal and food wastes as often as necessary to minimize the odors, vermin, and disease hazards for the health and well being of the animals.

To be corrected by: March 1, 2016.

3.127 (b) DIRECT NCI

FACILITIES, OUTDOOR.

There are two ferrets located in two separate enclosures of the outdoor housing facility that are consistently shivering. The wooden nesting boxes contain little to no bedding material. The ambient temperature recorded at the time of inspection was 40 degrees F using a Kestrel. The temperature inside the nesting box was 46 degrees F using a Raytek MiniTemp MT6 . According to the National Weather Service, the forecast for the low temperature tonight is 31 degrees F. Not having adequate shelter does not ensure the ferrets can maintain a safe body temperature and conserve body heat. The licensee must ensure that adequate shelter appropriate for the local climactic conditions for the species is provided by natural or artificial means. Correct by providing an appropriate shelter by moving the affected animals, adding supplemental heat source, and / or adding a sufficient amount of bedding to prevent discomfort to

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CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
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Received By:

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Date:
Feb-18-2016



Inspection Report

the animals during inclement weather.
To be corrected by: February 18, 2016.

3.128

DIRECT NCI

SPACE REQUIREMENTS.

The enclosures for the raccoons do not provide adequate space. According to the licensee, the largest raccoon enclosures are 30in x 57in and 18in tall. These enclosures housed an average of 3-4 adult raccoons in breeding groups. Smaller enclosures were 24in x 57in and 18in tall typically housing 2-3 adults and approximately 30in x 30 in and 18in tall housing 1 adult raccoon. These enclosures are not tall enough to allow a raccoon to sit up on its haunches or stand on its hind legs both of which are normal postural adjustments for raccoons. Additionally, these enclosures are all one level which does not allow for climbing or other species-typic behaviors. During the inspection raccoons were observed sniffing at the enclosure tops and turning partially on their hind legs brushing their head or nose on the enclosure tops. Several individual raccoons have partial or complete hair loss on the tail and abnormal, irregular chewed appearance to the hair on their sides and flanks. Additionally, approximately 50% of the raccoons are exhibiting abnormal repetitive (stereotypic) behaviors further supporting the inadequacy of space for these animals. Enclosures must be constructed and maintained to provide sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement. Correct by enlarging or modifying these enclosures to meet these needs.

To be corrected by: March 1, 2016

3.131

REPEAT

SANITATION.

There is a wooden nesting box being used by a striped skunk that has a buildup of wet excreta covering the entire floor surface located in the outdoor housing area. Two wooden shelters being used by four foxes have an excessive accumulation of excreta and soiled bedding covering most of the floor surface.

Excessive excreta in primary enclosures can contribute to odors, insects and other pests, and can play a role in disease transmission. Additionally, the presence of wet bedding and excreta decreases the effectiveness at providing shelter from the elements and may make animals less likely to use these when needed. No other shelter is provided to these animals in this area. The licensee must ensure that excreta be removed as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

Exit briefing conducted with licensee, Corbin Ranslem, ACI, Dana Miller, SACS and Margaret A Shaver, VMO.

Prepared By:

CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Feb-18-2016

Received By:

Title:

Date:
Feb-18-2016

Exhibit 6
APHIS Inspection Report
July 18, 2016



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ATTEMPTED INSPECTION

Date: Jul-18-2016

2.126

(b)

REPEAT

ACCESS AND INSPECTION OF RECORDS AND PROPERTY; SUBMISSION OF ITINERARIES.

A responsible adult was not available to accompany APHIS Officials during the inspection process at 10:45 AM on 07/18/2016. The inspector knocked on the front door of the residence. An animal caretaker was present and stated that the licensee was not home. The inspector then contacted the licensee via phone. The licensee stated that he was out-of-town and would not be home until the following day.

Prepared By:

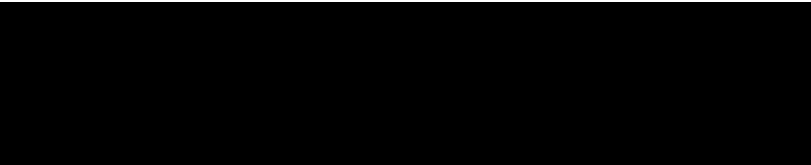
CORBIN RANSLEM, A C I

CORBIN L RANSLEM, A.C.I. USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR Inspector 6079

Date:
Jul-18-2016

Received By:



Title:

Date:
Jul-18-2016

Exhibit 7
APHIS Inspection Report
November 8, 2016



Inspection Report



NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ATTEMPTED INSPECTION

Date: 08-NOV-2016

2.126(b)

ACCESS AND INSPECTION OF RECORDS AND PROPERTY; SUBMISSION OF ITINERARIES.

A responsible adult was not available to accompany APHIS Officials during the inspection process at 11:25 AM on 08-Nov-16.

The inspector knocked on the front door of the residence and then called the cell phone number provided. The licensee stated that he was not in the area and unavailable for an inspection.

Additional Inspectors

Heather Cole, Veterinary Medical Officer

Prepared By:

CORBIN RANSLEM, A C I

CORBIN RANSLEM USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6079

Date:
08-NOV-2016

Received By:

Title:

Date:
08-NOV-2016

Exhibit 8
APHIS Inspection Report
December 7, 2016



Inspection Report



NEW SHARON, IA
[Redacted]

Customer ID: [Redacted]

Certificate: [Redacted]

Site: 001



Type: ROUTINE INSPECTION

Date: 07-DEC-2016

2.40(b)(2) REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

One white skunk has a large amount of hair loss over 50% of animal including back, legs and abdomen. A large area over the back has skin that appears thickened, scaly and cracked. Licensee states that he had not noticed this animal previously. Skin problems can indicate poor health or nutrition or injury/trauma to the animal. Conditions such as these may be painful and can lead to further health complications. Appropriate methods to prevent, control, observe, diagnose and treat diseases or injuries should be in place for all animals. The animal listed above must be examined by a licensed veterinarian in order to ensure that an accurate diagnosis is obtained and an appropriate treatment plan is developed and followed. This information, including the diagnosis, treatment and resolution of the condition, must be documented and made available to the inspector upon request. The licensee must ensure that all animals receive appropriate veterinary care at all times.

3.125(a) REPEAT

FACILITIES, GENERAL.

Multiple enclosures have broken wires or sharps points which may injury the animal or allow escape. Six outdoor fox enclosures have broken wires and sharp points in the multiple flooring and wall areas. The edges of wire panels around several support posts and where a wire panel had been overlaid have sharp points that had not been trimmed and are protruding into the living space. Many ferret enclosures housing more than 60 ferrets have broken wires in the flooring or gaps between the wall and floor. The broken wire areas are mainly along the back of the cage where fecal material accumulates. Some gaps between the wall and floor are due to broken or missing clips. Several (approximately three) skunk cages have broken wires or holes in the floor. The broken wires cause sharp points that are protruding into the living space and into the holes. Holes and gaps may allow escape or injury. One raccoon cage with three raccoons has a wire water bowl stand with many sharp points protruding into the cage open space where the raccoon could come in contact with when drinking. Sharp points can cause injury or trauma to the animal. Holes can allow animals to become entrapped or escape. Correction should include ensuring that all housing is constructed of material appropriate for the animals housed

Prepared By: CORBIN RANSLEM, A C I

CORBIN RANSLEM USDA, APHIS, Animal Care

Date:
08-DEC-2016

Title: ANIMAL CARE INSPECTOR 6079

Received By: [Redacted]
Title: [Redacted]

Date:
08-DEC-2016



Inspection Report

and is maintained in good repair to protect the animals from injury and contain the animals safely. Continual monitoring and maintenance of cage and housing is an ongoing process.

3.125(d) REPEAT

FACILITIES, GENERAL.

Two dead ferrets were found in separate ferret enclosures. One dead adult was found pushed into the corner of the wooden nest box. Two live adult ferrets are in this enclosure. The licensee removed this dead animal during the inspection. One dead, decomposing, headless juvenile ferret was found incorporated into the fecal material buildup on the wire floor in the corner of the cage. One live adult and six juvenile ferrets are in this enclosure. Dead animals in enclosures can increase the risk of disease and pest infestation to the live animals. Provisions for the prompt removal and disposal of dead animals from enclosures to minimize disease hazards and pest and vermin infestations should be implemented and maintained.

3.131(a) REPEAT

SANITATION.

Within the Ferret Building there is an excessive accumulation of ferret feces present in the back corners of 11 enclosures. The affected enclosures are located along the east wall and contain 23 ferrets. The licensee stated that the enclosures are cleaned out once a week. Excessive excreta in primary enclosures can contribute to disease hazards, odors, insects and other pests. The licensee must ensure that excreta be removed as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

This inspection and exit interview were conducted with the licensee, Heather Cole, VMO, Kelly Maxwell, ACI, Ann Goplen, VMO and Corbin Ranslem , ACI.

Additional Inspectors

- Ann Goplen, Veterinary Medical Officer
- Heather Cole, Veterinary Medical Officer
- Kelly Maxwell, Animal Care Inspector

Prepared By: CORBIN RANSLEM, A C I

CORBIN RANSLEM USDA, APHIS, Animal Care

Date:
08-DEC-2016

Title: ANIMAL CARE INSPECTOR 6079

Received By: [Redacted]
Title: [Redacted]

Date:
08-DEC-2016

Exhibit 9
APHIS Inspection Report
February 22, 2017



Inspection Report



NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: ROUTINE INSPECTION

Date: 22-FEB-2017

2.40(b)(2)

REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

A male spotted skunk (approximately 3 years old) has a hairless area behind the shoulder blades along the spine. The area is reddened and a dark brown crusty material was present. Closer examination of the animal revealed numerous small black insects crawling throughout the affected area. The licensee was unaware of the condition and stated that he has never applied parasite control products to the spotted skunk.

A white, adult, female skunk has extreme hair loss on its body. The area behind both shoulder blades, across the back, and around the base of its tail are nearly completely devoid of hair. The hair loss extends down the sides of its body to its abdomen. The last one-third of the tail also has severe hair loss and a crusty dark brown material is present on the affected area.

A white, adult, female raccoon has abnormal areas of hair loss on its body. The hair loss is located behind the rib cage across the right and left flank area. The area of hair loss is larger on the right side of the body and the entire tail is completely devoid of hair.

The licensee has not consulted a veterinarian about the abnormal health conditions of the animals listed above. Skin problems can indicate the presence of ectoparasites, poor health or nutrition or injury/trauma to the animal. Conditions such as these may be painful, cause discomfort and lead to further health complications.

Appropriate methods to prevent, control, observe, diagnose and treat diseases, injuries or parasite problems should be in place for all animals. The animals listed above must be examined by a licensed veterinarian in order to ensure that an accurate diagnosis is obtained and an appropriate treatment plan is developed and followed. This information, including the diagnosis, treatment and resolution of the condition, must be documented and made available to the inspector upon request. The licensee must ensure that all animals receive appropriate veterinary care at all times.

Prepared By:

RANSLEM CORBIN, A C I

RANSLEM CORBIN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6079

Date:
23-FEB-2017

Received By:

Title:

Date:
23-FEB-2017



Inspection Report

3.125(a) REPEAT

FACILITIES, GENERAL.

Two enclosures, containing a total of four foxes, have nails protruding through the wooden braces into the enclosures. The ends of the nails have created sharp points which the foxes could come into contact with while moving throughout the enclosures.

Five enclosures, containing eleven ferrets, have metal water receptacles. The water receptacles are attached to the side of the enclosure by wire. The ends of the wires are creating sharp points which the ferrets could come into contact with when drinking from the receptacles.

Four enclosures, containing thirteen ferrets, have a plastic shelf. The plastic shelf is attached to the corner of the enclosure by wire. The ends of the wires are creating sharp points which the ferrets could come into contact with.

Four enclosures, containing eight ferrets, have broken wires around the entry door into the den box. The ferrets could come into contact with the sharp ends of the wires as they enter and exit the den box.

Sharp wire points that animals can come in contact with could cause injuries, be very painful and potentially lead to additional health problems.

The licensee must ensure that all housing is constructed of material appropriate for the animals housed and is maintained in good repair to protect the animals from injury and contain the animals safely. Continual monitoring and maintenance of cage and housing is an ongoing process.

3.125(d) REPEAT

FACILITIES, GENERAL.

The interior surfaces of the machine used to prepare food for the regulated animals have an accumulation of dried and caked food material. There's also a buildup of old and fresh food waste under and on the exterior surfaces of the machine. The licensee stated that it has been about a month since it was cleaned.

Food waste that is not frequently removed from food receptacles, food preparation areas, food storage areas and housing facilities can lead to contamination, disease hazards and vermin infestations.

Prepared By:

RANSLEM CORBIN, A C I

RANSLEM CORBIN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6079

Date:
23-FEB-2017

Received By:

Title:

Date:
23-FEB-2017



Inspection Report

The licensee must remove food waste and other debris as often as necessary to minimize odors, vermin infestations and disease hazards.

3.131(a) REPEAT

SANITATION.

One enclosure, containing at least one white raccoon, has a buildup of old excrement located in front of the den box. Most of the excrement is dried and covered in a gray material that has the appearance of mold.

Another enclosure, containing three raccoons, has a thick layer of dried food waste and organic material covering the surfaces on the front-half of the wire enclosure.

Three ferret enclosures, containing twelve ferrets, have an excessive buildup of old and new feces in the back corners. An enclosure containing one ferret, has an excessive buildup of feces located directly next to and beneath the opening of the den box.

Failure to remove excreta, food waste and other organic material from the enclosures can lead to contamination, disease hazards and odors, which can affect the health and well-being of the animals.

The licensee must ensure that excreta is removed from all primary enclosures as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

This inspection and exit interview were conducted with the licensee, Corbin Ranslem, ACI, Kelly Maxwell, ACI and Ann Goplen, VMO.

*The white skunk listed under 2.40 (b)(2) on the December 7, 2016 inspection report received veterinary care.

Additional Inspectors

Goplen Ann, Veterinary Medical Officer

Maxwell Kelly, Animal Care Inspector

Prepared By:

RANSLEM CORBIN, A C I

RANSLEM CORBIN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6079

Date:
23-FEB-2017

Received By:

[Redacted Signature]

Title:

Date:
23-FEB-2017

Exhibit 10
APHIS Inspection Report
May 17, 2017



Inspection Report



NEW SHARON, IA
[Redacted]

Customer ID: [Redacted]

Certificate: [Redacted]

Site: 001



Type: ATTEMPTED INSPECTION

Date: 17-MAY-2017

2.126(b) REPEAT

ACCESS AND INSPECTION OF RECORDS AND PROPERTY; SUBMISSION OF ITINERARIES.

A responsible adult was not available to accompany APHIS Officials during the inspection process at 11:13 a.m. on 17-May-17.

The inspector knocked at the front door of the residence. After no response, the inspector then called the licensee. The licensee stated that he was unavailable for an inspection today. During the phone conversation, the inspector requested that the licensee provide optimal hours for inspections.

Additional Inspectors

Unck Autumn, Veterinary Medical Officer

Maxwell Kelly, Animal Care Inspector

Prepared By:

RANSLEM CORBIN, A C I

RANSLEM CORBIN, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6079

Date:
17-MAY-2017

Received By:

Title:

Date:
17-MAY-2017

Exhibit 11
APHIS Inspection Report
June 12, 2017



Inspection Report



NEW SHARON, IA
[Redacted]

Customer ID: [Redacted]

Certificate: [Redacted]

Site: 001



Type: ROUTINE INSPECTION

Date: 12-JUN-2017

2.131(e)

HANDLING OF ANIMALS.

The Raccoon Building has a high ambient temperature and humidity. The building is constructed of metal and is not insulated. There are large fans running at one end of the building and there are windows that are open along the sides. Towards the middle of the building there is little to no movement of air and the temperature in this part of the building as taken by the Kestrel at approximately 1:30 pm is 91.6 degrees F, the humidity is 84% and the heat index is 111.7 degrees F. Multiple raccoons were displaying behaviors such as panting and lying on their sides and abdomens with their legs splayed out that could indicate they are uncomfortable with the temperature. There are approximately 290 raccoons housed in this building. High temperature and humidity could have a negative impact on the health and well-being of the animals.

When climatic conditions present a threat to an animal's health and well-being, appropriate measures must be taken to alleviate the impact of those conditions. An animal may never be subjected to any combination of temperature, humidity and time that is detrimental to the animal's health or well-being. The licensee must reduce the temperature and humidity inside this building to a level that is comfortable for the raccoons in order to support their health and well-being.

To be corrected by: June 19, 2017

3.125(a) REPEAT

FACILITIES, GENERAL.

Multiple enclosures in the Ferret Buildings and outdoor ferret housing have broken wires creating sharp points at the level of the animals. At least four enclosures, containing at least ten ferrets, have broken wires in the back corners of the enclosures. At least two enclosures, containing at least seven ferrets, has broken wires around the opening to the nest box. In at least five outdoor housing enclosures, containing six ferrets, there are sharp points created by twisted wire that's attaching shelves to the sides of the enclosures. At least two of the outdoor housing enclosures, containing two ferrets, have broken wires and sharp points in the back corners of the enclosures.

Prepared By: **MAXWELL KELLY, A C I**

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Date:
13-JUN-2017

Title: ANIMAL CARE INSPECTOR 6080

Received By: [Redacted]
Title: [Redacted]

Date:
13-JUN-2017



Inspection Report

Multiple skunk enclosures have broken wires creating sharp points at the level of the animals. One enclosure containing four skunks has a large hole in the flooring created by broken wires. Sharp points surround this hole in the floor. At least two enclosures, containing at least two skunks, have broken wires creating sharp points around the opening to the nest box. Two enclosures, containing two skunks, have broken wires in the back corner of the enclosure.

In the Ferret Building one enclosure, containing three ferrets, has an 1.5 inch gap between the nest box and the cage. One ferret was seen with his head, neck and forelegs through the opening.

One enclosure, containing at least one skunk, has a wooden nest box and the bottom of the nest box has become detached from one corner resulting in a large gap which the animal could be seen through.

Two other enclosures, containing two skunks, have large gaps between the nest box and the enclosure. In one enclosure, containing one skunk, the wire flooring has become unattached to the wire side resulting in a large gap and a broken wire.

Holes and gaps in the enclosure may allow animals to escape or cause injury. Sharp points can cause injury or trauma to the animal. The licensee must eliminate all the sharp points, gaps and holes as well as, ensure that all housing is constructed of material appropriate for the animals housed and is maintained in good repair to protect the animals from injury and contain the animals safely. Continual monitoring and maintenance of cage and housing is an ongoing process.

3.125(d) REPEAT

FACILITIES, GENERAL.

There is an excessive accumulation of fresh and old excreta beneath the enclosures located in the Raccoon Building. Under several enclosures containing raccoons, there are numerous live maggots present in the piles of excreta. There is also a significant accumulation of hair, organic matter, and other debris along the cage supports in both Ferret Buildings and the Raccoon Building.

Excessive accumulations of animal waste in the housing area can lead to poor air quality, disease hazards and pest infestations. Poor air quality is linked to the development of health problems and many fumes, such as ammonia, can cause discomfort to animals and can lead to conditions such as respiratory and eye abnormalities. The licensee must remove animal and food wastes as often as necessary to minimize the odors, vermin, and disease hazards for the health and well being of the animals.

Prepared By:

MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Date:

13-JUN-2017

Title:

ANIMAL CARE INSPECTOR 6080

Received By:

Title:

Date:

13-JUN-2017



Inspection Report

3.131(a) REPEAT

SANITATION.

Within the Ferret Building there is an excessive accumulation of ferret feces present in the back corners of at least three enclosures, containing at least eight ferrets. One enclosure, containing at least one ferret, has an excessive buildup of hair and dark organic material on the wire floor of the enclosure. One enclosure, containing at least four ferrets, has a buildup of dark organic material in a corner of the nest box. This organic material is infested with live maggots and the ferrets were seen stepping in the material and maggots.

Excessive excreta, hair and grime in primary enclosures can contribute to disease hazards, odors, insects and other pests. The licensee must ensure that excreta, hair, and other organic waste is removed as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

3.131(d) REPEAT

SANITATION.

The Ferret Building and a Skunk Building has an excessive number of flies in the housing area, in and around the enclosures and on the feed. A large number of flies were seen throughout the enclosures containing two spotted skunks and on the ceiling directly above these enclosures.

The animals are fed a raw ground meat mixture that is placed on the top of their wire enclosures. In one outdoor housing building the food on top of at least three enclosures, housing at least five skunks, has become dried and is heavily covered in flies.

An enclosure located in the outdoor housing area has a large wasp nest made out of mud within the nesting box that three ferrets can come in contact with.

The presence of pests can cause contamination of the food supply and also lead to health hazards for the animals. The licensee must establish and maintain a safe and effective program for the control of flies and other pests.

The following animals were cited on the previous inspection report under 2.40 (b)(2) and have been evaluated by a licensed veterinarian:

Female white skunk

Prepared By:

MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6080

Date:
13-JUN-2017

Received By:

Title:

Date:
13-JUN-2017



Inspection Report

Female raccoon

The following animal cited on the previous report under 2.40 (b)(2) has been evaluated by a licensed veterinarian and received treatment:

Male spotted skunk

Inspection and exit interview conducted with ACI Kelly Maxwell, VMO Autumn Unck, ACI Corbin Ranslem, and the facility representative.

Additional Inspectors

Unck Autumn, Veterinary Medical Officer

Ranslem Corbin, Animal Care Inspector

Prepared By:

MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6080

Date:
13-JUN-2017

Received By:

Title:

Date:
13-JUN-2017

Exhibit 12
APHIS Inspection Report
July 19, 2017



Inspection Report



NEW SHARON, IA
[Redacted]

Customer ID: [Redacted]

Certificate: [Redacted]

Site: 001



Type: FOCUSED INSPECTION

Date: 19-JUL-2017

2.40(b)(2) DIRECT REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

A dark colored female raccoon is lying flat on her right side along the front of the enclosure. The raccoon appeared lethargic and had no response when approached by the inspector and the facility representative. The raccoon would slightly raise her head, but would not get up and move. The facility representative thought the animal is an older raccoon and may not be getting along with her pen mates.

A female white raccoon has an abnormal appearance to her left eye. At least half of the surface of the left eye is covered in a white-yellowish colored discharge. There is a dark line of material under the bottom of the eye.

The above mentioned raccoons must be evaluated by a licensed veterinarian for a proper diagnosis and to establish an effective treatment plan. The diagnosis and treatment plan must be documented in writing and available to the inspector upon request. The licensee must ensure that all animals receive adequate veterinary care at all times.

2.131(e) DIRECT REPEAT

HANDLING OF ANIMALS.

The Raccoon Building has a high ambient temperature and humidity. The building is constructed of metal and is not insulated. There are large fans running at both ends of the building and there are windows that are open along the sides. Towards the middle of the building there is little to no movement of air and the temperature in this part of the building as taken by the Kestrel at approximately 2:00 pm is 96.1 degrees F and the heat index is 119.4 degrees F. The outdoor air temperature at the time of the inspection as read by the Kestrel 101 degrees and the heat index is 113 degrees. Multiple raccoons were displaying behaviors such as panting and lying on their sides and abdomens with their legs splayed out that could indicate they are uncomfortable with the temperature. There are approximately 290 raccoons housed in this building. High temperature and humidity could have a negative impact on the health and well-being of the animals.

When climatic conditions present a threat to an animal's health and well-being, appropriate measures must be taken

Prepared By: MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Date:
19-JUL-2017

Title: ANIMAL CARE INSPECTOR 6080

Received By: [Redacted]

Title:

Date:
19-JUL-2017



Inspection Report

to alleviate the impact of those conditions. An animal may never be subjected to any combination of temperature, humidity and time that is detrimental to the animal's health or well-being. The licensee must reduce the temperature and humidity inside this building to a level that is comfortable for the raccoons in order to support their health and well-being.

This inspection and exit interview were conducted with Kelly Maxwell, ACI, and the facility representative.

This is a focused inspection conducted only on the building containing the raccoons.

Prepared By:

MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6080

Date:
19-JUL-2017

Received By:

Title:

Date:
19-JUL-2017

Exhibit 13
APHIS Inspection Report
July 20, 2017



Inspection Report



NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001



Type: FOCUSED INSPECTION

Date: 20-JUL-2017

2.131(e) DIRECT REPEAT

HANDLING OF ANIMALS.

The Raccoon Building has a high ambient temperature and humidity. The building is constructed of metal and is not insulated. There are a total of six fans running at both ends of the building and there are windows that are open along the sides. Towards the middle of the building there is little to no movement of air. The temperatures taken throughout the building by the Kestrel at approximately 2:50 pm is 98.4 degrees F with a heat index 117.2 degrees F, 100.3 degrees F with a heat index 123.3 degrees F, 98.9 degrees F with a heat index of 118.4 degrees F, and 101.4 degrees F and 101.8 degrees F. Numerous raccoons were displaying behaviors such as panting, drooling and increased respiratory rate. The raccoons are also seen lying on their sides, backs, and abdomens with their legs splayed out which could indicate they are uncomfortable with the temperature. There are approximately 290 raccoons housed in this building. High temperature and humidity could have a negative impact on the health and well-being of the animals.

When climatic conditions present a threat to an animal's health and well-being, appropriate measures must be taken to alleviate the impact of those conditions. An animal may never be subjected to any combination of temperature, humidity and time that is detrimental to the animal's health or well-being. The licensee must reduce the temperature and humidity inside this building to a level that is comfortable for the raccoons in order to support their health and well-being.

Inspection and exit interview was conducted with Kelly Maxwell, ACI, Autumn Unck, VMO and the facility representative.

This is a focused inspection concerning the non-compliant items listed on the previous inspection report dated July 19, 2017.

Prepared By:

MAXWELL KELLY, A C I

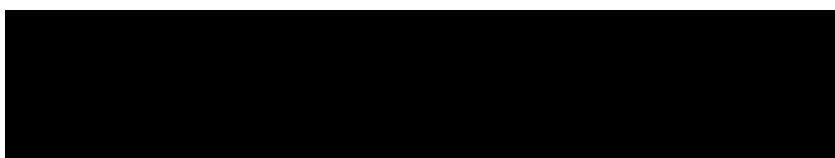
MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Date:

20-JUL-2017

Title: ANIMAL CARE INSPECTOR 6080

Received By:



Date:

20-JUL-2017



Inspection Report

Female white raccoon was evaluated by a licensed veterinarian and is under a treatment plan.

Female dark-colored raccoon was evaluated by a licensed veterinarian and received treatment.

Additional Inspectors

Unck Autumn, Veterinary Medical Officer

Prepared By:

MAXWELL KELLY, A C I

MAXWELL KELLY, A C I USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR 6080

Date:
20-JUL-2017

Received By:

Title:

Date:
20-JUL-2017

Exhibit 14
APHIS Inspection Report
July 25, 2017



Inspection Report

NEW SHARON, IA

Customer ID: [REDACTED]

Certificate: [REDACTED]

Site: 001

[REDACTED]

Type: FOCUSED INSPECTION

Date: 25-JUL-2017

2.131(e) DIRECT REPEAT

HANDLING OF ANIMALS.

The Raccoon Building has a high ambient temperature and humidity. The building is constructed of metal and is only partially insulated. There are eighteen fans running throughout the building and there are windows that are open along the sides. The temperature as taken by the Kestrel at the beginning of the inspection upon first entering the building is 93.5 degrees F with a heat index 100.7 degrees F. Multiple readings of the temperature and heat index were taken during the inspection in different areas of the building. The temperatures taken were 93.7 degrees, 94.1 degrees F, 94.2 degrees F, 94.1 degrees F, 95.7 degrees F, 95.2 degrees F, 95.4 degrees F, 95.0 degrees F, 95.2 degrees F. The heat indices in the building are 101.1 degrees F, 101.7 degrees F, 104.9 degrees F, 106.0 degrees F, 105.1 degrees F, 106.3 degrees F, 108.0 degrees F, 107.4 degrees F, 107.6 degrees F, 106.8 degrees F, 103.6 degrees F, 104.5 degrees F. Nine raccoons are in serious heat distress (too hot) and are suffering from the temperatures inside the building.

The behaviors observed in these nine raccoons include panting, open mouthed breathing, and increased respiratory rate (fast breathing). The raccoons are lying on their sides, backs, and abdomens with their legs splayed out demonstrating they are uncomfortable with the temperature and are trying to cool off. These nine raccoons are also reluctant to move, lethargic, and not alert to activity in the building around them. These signs are indicative of the elevated temperature inside the building not allowing the animals to regulate their core body temperature properly. The inability of these nine raccoons to cool off has caused them to suffer. There are approximately 290 raccoons housed in this building. The high temperature and humidity is having a negative impact on the health and well-being of the animals.

When climatic conditions present a threat to an animal's health and well-being, appropriate measures must be taken to alleviate the impact of those conditions. An animal may never be subjected to any combination of temperature, humidity and time that is detrimental to the animal's health or well-being. The licensee must reduce the temperature and humidity inside this building to a level that is comfortable for the raccoons in order to support their health and well-being.

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27-JUL-2017

Date:

27-JUL-2017



Inspection Report

This inspection and exit interview was conducted with VMO Scott Welch, SACS Heather Cole, ACI Kelly Maxwell, a safety officer, an IES investigator, the attending veterinarian, local law enforcement, an Iowa Trooper and the facility representative.

This is a focused inspection concerning the non-compliant item listed on the previous inspection report dated July 21, 2017.

Additional Inspectors

Cole Heather, Supervisory Animal Care Specialist

Welch Scott, Veterinary Medical Officer

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Exhibit 15
APHIS Inspection Report
August 21, 2017



Inspection Report

NEW SHARON, IA

Customer ID: [Redacted]

Certificate: [Redacted]

Site: 001

[Redacted]

Type: ROUTINE INSPECTION

Date: 21-AUG-2017

2.40(b)(2) DIRECT REPEAT

ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE (DEALERS AND EXHIBITORS).

A female ferret is laying in the corner of her enclosure and closer inspection of the animal revealed that she is lethargic, appeared weakened, and has numerous engorged ticks located on her head and body. Ticks attached and feeding off the animal could be detrimental to the animal's health and a lethargic attitude could indicate an underlying health issue.

This ferret must be evaluated by a licensed veterinarian for a proper diagnosis and treatment plan. This diagnosis and treatment plan must be documented in writing and available to the inspectors upon request.

At the exit interview the inspectors verbally instructed the licensee to have the ferret evaluated by a licensed veterinarian by noon on August 23, 2017.

3.125(a) REPEAT

FACILITIES, GENERAL.

In the "Ferret Building" at least seven enclosures, containing a total of at least fifteen ferrets, have broken wires creating sharp points at the level of the animals. The affected enclosures have broken wires in the back corners along the enclosure flooring or broken wires in the center of the floors creating holes that an animal's foot could pass through.

At least thirteen enclosures, containing at least sixteen skunks have broken wires creating sharp points at the level of the animals. Several of the affected enclosures have sharp points located around the entry door of the nest box. One affected enclosure has a nest box that has been pulled apart and the sharp end of a nail is exposed. Another affected enclosure has broken wires in the floor creating a hole that an animal's foot could pass through. One affected enclosure has a long, loose wire hanging through the enclosure and another enclosure has a piece of metal attached to the side wall and the twisted wire holding the metal onto the enclosure has a created a sharp

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Inspection Report

point.

In two enclosures, containing a total of four foxes, the wooden frames have rotted away leaving exposed nails at the level of the animals. In two enclosures, containing a total of four foxes, the wooden floor supports under the enclosures have broken and are no longer fully supporting the wire floors. In another enclosure, containing one fox, there is a broken wire creating a sharp point around the water receptacle.

In one enclosure containing at least two raccoons, there is a long piece of loose wire creating a sharp point at the level of the animals. In at least three more enclosures, containing a total of at least six raccoons, there is a broken wire creating a sharp point around the water receptacle.

In the "Ferret Building" one enclosure, containing three ferrets, has a gate that is loose and easily moved. The gate could be opened far enough that the foot and leg of an animal could pass through.

Sharp points and holes in the flooring could cause injury to the animals. Broken structural supports could cause the enclosure to be unsafe for the animals. The licensee must eliminate all the sharp points and holes in the flooring, as well as, ensure that all housing including the wooden framework is constructed of material appropriate for the animals housed and is maintained in good repair to protect the animals from injury and contain the animals safely. Continual monitoring and maintenance of cage and housing is an ongoing process.

3.130

WATERING.

In one enclosure, containing two foxes, the inside of the water receptacle is coated with green algae and the algae is floating in the water. In one enclosure containing one fox and another enclosure containing at least one raccoon, there is an excessive number of flies floating in the water. Water sources contaminated by algae and insects could have a negative effect on the health of the animals.

If potable water is not accessible to the animals at all times, it must be provided as often as necessary for the health and comfort of the animals. All water receptacles shall be kept clean and sanitary. The licensee must ensure that the water source is free of algae and flies to ensure the health and well-being of the animals.

Correction date: By noon on August 23, 2017

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22-AUG-2017



Inspection Report

3.131(a) REPEAT

SANITATION.

At least nine enclosures, containing at least eighteen raccoons, have an excessive buildup of old excrement located in front of the den box or at the front of the enclosure. Some of the excrement is dried and covered in a gray material that has the appearance of mold.

In one enclosure, containing one skunk, the nest box has an excessive buildup of dried, dark colored organic material inside it.

Failure to remove excreta, food waste and other organic material from the enclosures can lead to contamination, disease hazards and odors, which can affect the health and well-being of the animals.

The licensee must ensure that excreta and organic material is removed from all primary enclosures and nest boxes as often as necessary to prevent contamination of the animals contained therein and to minimize disease hazards and to reduce odors.

3.131(d) REPEAT

SANITATION.

The animals are fed a raw ground meat mixture that is placed on the top of their wire enclosures. In the "Ferret Building" at least two enclosures, containing at least six ferrets, has a heavy accumulation of flies on the food and one of these affected enclosures has a large number of insects on the walls of the enclosure. In this same building, one enclosure containing one fox, has a large accumulation of flies in the food receptacle. In the "Raccoon Building" one enclosure containing at least three raccoons has a heavy accumulation of flies on the food. In one enclosure containing one skunk there is a heavy accumulation of flies on the food.

Beneath numerous enclosures in the "Ferret Building", "Raccoon Building" and at least one skunk enclosure there is an excessively large number of maggots mixed in the excreta and organic material.

The presence of pests can cause contamination of the food supply and also lead to health hazards for the animals. The licensee must establish and maintain a safe and effective program for the control of flies and other pests.

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Inspection Report

The non-compliant item listed under 2.131(e) DIRECT on the inspection report dated July 25, 2017 has been corrected.

The inspection was conducted with Kelly Maxwell, ACI, Autumn Unck, VMO and an Iowa State Trooper and the facility representative.

On August 22, 2017, the exit interview was conducted with Kelly Maxwell, ACI, Corbin Ranslem, ACI, and an Iowa State Trooper and the facility representative.

Additional Inspectors

Unck Autumn, Veterinary Medical Officer

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