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April 28, 2026

Bernadette Juarez  
Deputy Administrator, Animal Care  
U.S. Dept. of Agriculture, Animal Plant & Health Inspection Service

Jim Stinebaugh  
Asst. Special Agent in Charge  
U.S. Fish & Wildlife Service

Re: Urgent request to investigate Scott Edwards/Sharkarosa Zoo (license no. 74-C-1032) for apparent Animal Welfare Act violations

VIA Email

Dear Ms. Juarez and Mr. Stinebaugh:

I am writing on behalf of the Animal Legal Defense Fund to urge the U.S. Dept. of Agriculture (USDA) and the U.S. Fish & Wildlife Service (USFWS) to urgently investigate Scott Edwards, license-holder for Sharkarosa Zoo (license no. 74-C-1032), located at 11670 Massey Rd., Pilot Point, TX for apparent violations of the Animal Welfare Act (AWA) and Endangered Species Act (ESA) relating to two ESA-protected lions, Nzuri and Kali, who struggle to stand and remain upright.

On Sunday, April 26, two veterinarians with extensive large carnivore experience, Dr. Monica Bando and Dr. Valerie Johnson, visited Sharkarosa Zoo and observed and documented Nzuri “profoundly unsteady on all four limbs, often adopting a wide-based stance, swaying, with a tendency to lean to the right, limbs regularly crossing over, stumbling frequently, and falling,” according to Dr. Bando. [See Video 1](#), [Video 2](#). Dr. Bando stated that:

In my professional opinion, I am gravely concerned about the welfare of these lions due to the severe proprioceptive and vestibular ataxia observed, preventing Nzuri from standing and walking without swaying and stumbling, causing her to fall over and struggle to right herself. This type of severe incoordination and imbalance is most concerning for a brainstem lesion but could also be caused by a neuromuscular disorder or degenerative condition, such as a nutritional deficiency.”

According to Dr. Johnson:

The disease suffered by the white lions impairs their ability to walk, lie down, and get up from a lying down position. This causes muscle wasting which can be clearly seen in these lions. The lack of muscle puts extra pressure on the joints pre-disposing them to joint disease and pain. It limits their ability to seek water and shade and remove

themselves from uncomfortable positions. The inability to lie down causes the lion to fall and struggle to right herself, which causes painful bruising and could cause more serious injuries. Advanced imaging such as CT or MRI should be pursued for these lions to determine exactly what is causing these issues so that definitive or palliative treatment can be pursued with medication or surgery.

Dr. Bando further recommends that:

These lions require comprehensive evaluations with veterinarians and specialists with relevant expertise to try to identify the cause of their neurological disorder, which includes screening for nutritional deficiencies and infectious disease via bloodwork and cerebrospinal fluid, and advanced imaging such as MRI or CT scans. These lions also require improved housing and husbandry that provides greater safety and comfort away from members of the public, including easier access to comfortable indoor spaces with ample soft substrates to reduce the risk of injury. In addition, a formal welfare assessment by a team with relevant expertise is essential to determine the most appropriate course of action that prioritizes the physical and psychological well-being of these individuals. Transferring these lions to a GFAS-accredited sanctuary with a full-time veterinarian who has training and extensive expertise in big cats, including big cats who have exhibited similar symptoms is essential.

Signage at the facility notes that the lions “walk a bit wobbly” and “have an unsteady stance,” as well as suggesting that the lions were diagnosed with a “neurological condition” in 2023, though it does not specify which condition. *See [Photo 1](#)*. A zookeeper informed Drs. Bando and Johnson that a veterinarian performs unspecified “bloodwork” on the lions every 6 months but did not mention any other diagnostics or treatment. The facility signage also states that the lions can be more sensitive to their surroundings and then they list ways for the public to help by keeping noise down. Dr. Bando observed that despite this messaging:

During our visit, a truck with blaring music drove by the road behind the zebra exhibit, which is directly across from the lions. There is also a constant barrage of zoo visitors including children. The lion cage/enclosure does not contain any visual barriers for the lions to retreat from public view or from each other. When we were there, the lions did not appear to have access to the wooden shelter at the back of their enclosure, and the door to the container tank which serves as their indoor area was shut, likely to keep the animals out on exhibit to maximize public viewing, preventing them from choosing where to spend their day.

The condition of these lions appears to violate 9 C.F.R. § 2.40 of the AWA, which requires the provision of adequate veterinary care, and 9 C.F.R. § 2.131(a), which requires that “[a]ll licensees who maintain wild or exotic animals must demonstrate adequate experience and knowledge of the species they maintain”.

Importantly, the lions' conditions place their health in serious danger, requiring the USDA to notify the U.S. Dept. of Justice, which has authority to apply for a temporary restraining order (TRO) or injunction to prevent Edwards from operating in violation of the AWA.<sup>1</sup>

The lions' conditions also appear to constitute a "take" in violation of the ESA, which prohibits harassment of protected animals, including lions.<sup>2</sup> In *People for the Ethical Treatment of Animals v. Tri-State of Western Maryland*, an ESA civil lawsuit, a lion named Mbube declined over a period of years at a roadside zoo until, like Nzuri and Kali, he was unable to stand or walk properly.<sup>3</sup> Another lion at the roadside zoo, Peka, suffered from an abnormal gait that "likely cause[d] Peka discomfort and pain and put[] her at risk of further joint problems such as degenerative joint disease."<sup>4</sup> Neither Mbube nor Peka were ever examined by a qualified veterinarian while at the roadside zoo and never received appropriate diagnosis or treatment.<sup>5</sup> The court held that the roadside zoo at issue had harassed Mbube and Peka in violation of the ESA by failing to provide them with appropriate veterinary care, in Mbube's case, "[n]earing death, [he] was at one point so weak that he was constantly falling over, cutting and bruising his own body."<sup>6</sup>

Nzuri's inability to maintain an upright posture is similar to that of a female lion, Nala, who was rescued by People for the Ethical Treatment of Animals in 2020 from former roadside zoo operator, Jeff Lowe. [Video 3](#) In *People for the Ethical Treatment of Animals v. Lowe*, an ESA civil case, the court found that Jeff Lowe committed a take against Nala and her littermates because their veterinarian lacked training and experience in lions, and that the veterinary care the lions received "failed to sufficiently address documented and likely injuries of the lions", among other issues.<sup>7</sup> Nala, who was transferred to The Wild Animal Sanctuary, for which Dr. Johnson serves as a veterinarian, underwent advanced diagnostics, including imaging and appropriate bloodwork, was found to have severe vitamin deficiencies, which have been corrected with appropriate diet and supplementation.

As described above, it violates the ESA to cause protected animals to suffer as a result of failing to properly diagnose or treat them. The AWA requires that Attending Veterinarians be provided the "appropriate authority to determine the veterinary care animals receive and ensure that the care provided is adequate."<sup>8</sup> Dr. Bando notes that, "The inability to stand or walk without falling down and then struggling to right oneself is indicative of a severely compromised quality of life. This inability to control their movements can cause constant and/or recurring frustration, confusion, fear, anxiety, and distress." It is inconceivable that a veterinarian with the training and experience required by the AWA would allow Nzuri and Kali to languish as they are as doing so would fail to meet minimum standards of care required

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<sup>1</sup> 7 U.S.C. § 2159.

<sup>2</sup> 16 U.S.C. §§ 1538, 1532(19); 50 C.F.R. §§ 17.3, 17.11.

<sup>3</sup> *People for Ethical Treatment of Animals, Inc. v. Tri-State Zoological Park of W. Maryland, Inc.*, 424 F. Supp. 3d 404, 422 (D. Md. 2019), *aff'd*, 843 F. App'x 493 (4th Cir. 2021).

<sup>4</sup> *Id.* at 426.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 431.

<sup>7</sup> *People for Ethical Treatment of Animals, Inc. v. Lowe*, No. CIV-21-0671-F, 2022 WL 576560, at \*4 (W.D. Okla. Feb. 25, 2022).

<sup>8</sup> "How Much Authority Does an Attending Veterinarian Have?", U.S. Dept. of Agric., <https://www.aphis.usda.gov/animals/animal-welfare/attending-veterinarians/authority> (last accessed Apr. 27, 2026).

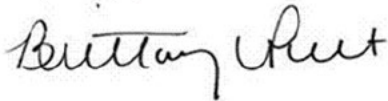
for veterinary professionals. Nzuri and Kali deserve, and the law requires that they be provided with appropriate diagnostics and treatment for their conditions as well as humane conditions of confinement. Edwards appears to be failing to meet these minimum standards required by federal law.

Nzuri and Kali require urgent veterinary and welfare interventions. Edwards has apparently long been aware of their veterinary and welfare issues but has apparently failed to take appropriate steps to ensure the lions' quality of life as required by the AWA and ESA. ALDF urges your agencies to:

- immediately use your authority to confiscate Nzuri and Kali,
- ensure the lions are safely transported to a Global Federation of Sanctuaries-accredited sanctuary that can provide them the urgent veterinary care they require,
- suspend Edwards' AWA license,
- initiate an AWA enforcement action to permanently revoke Edwards' AWA license, and
- refer this matter to the U.S. Dept. of Justice to pursue a TRO against Edwards and a civil enforcement action for apparent AWA and ESA violations.

ALDF would welcome the opportunity to connect you with Drs. Bando and Johnson to discuss their observations in more detail.

Very truly yours,



Brittany Peet | Transparency and Regulatory Affairs Program Director  
Animal Legal Defense Fund

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Cc: [Redacted]