



Declaration of Jim Houston

1. Pursuant to 28 U.S.C. § 1746 I, Jim Houston, declare and affirm that the statements contained herein are true and accurate and made from the best of my knowledge and belief. I am over the age of 18 and provide this statement freely and voluntarily.
2. I have owned and operated Jim's Lion and Tiger Cub Petting, the most successful animal interaction sanctuary experience in the state of Pennsylvania, since 2015. In that span, I have provided care for approximately 30 lions and tigers, almost all of whom I made the choice to have declawed. Those lions and tigers I did not declaw were either sent to my sanctuary already having been declawed from other owners, or else were rehomed by me (free of charge) to other sanctuaries within days of their birth.
3. My sanctuary's primary business is exhibiting lions and tigers through events we call "Lion and Tiger Cub Petting." Until December 2022, we invited members of the public to fully interact with, play, and feed lions and tigers aged between 6 and 16 months in exchange for a twenty-five-dollar donation. During these sessions, me or another JLTCP staff member would give a brief introduction and then carry the animals to the room—a large insulated barn on our property—where anywhere from thirty to fifty members of the public can greet the animals. We encouraged, within reason, attendees to pet, touch, and pick up these animals, as we only have ever used cubs who are comfortable with such interaction. After December 2022, we stopped permitting individuals other than authorized caregivers to touch or otherwise come into physical contact with the lions and tigers.
4. Before operating Jim's Lion and Tiger Cub Petting, I worked for more than two decades following my graduation from high school at an animal sanctuary in Myrtle Beach, South Carolina. I have more than two decades of experience with lions and tigers. These have been immensely rewarding and loving relationships—I have a natural affinity and understanding for lions and tigers, which they have always reciprocated.

5. I instruct my staff to remove every lion and tiger born at my sanctuary from their mother within days, if not hours, of their birth.
6. The reason I have lions and tigers declawed is the safety of myself, my staff, and visitors to Jim's Lion and Tiger Cub Petting. For obvious reasons, lions and tigers who have been declawed pose less of a danger to both humans and other animals. In addition to protecting human caretakers and other animals, declawing also protects the animals themselves from needing to be euthanized after negative interactions with humans.
7. I made this decision in consultation with numerous veterinarians I have known and worked with, all of whom routinely declaw domestic cats in their day-to-day business. They explained to me that lion and tiger anatomy is not particularly different from domestic cats, and that declaw procedures are essentially the same in all material respects between species. I understand it to be a simple medical procedure conducted by thousands upon thousands of veterinarians across the country.
8. I also consulted with materials published by the American Veterinary Medical Association, which state that it defers to veterinarians on each case of declawing.
9. I did my own research into the legality of declawing lions and tigers. While opinions on declawing are notoriously mixed, I did not come across any law that would prohibit declawing of lions and tigers in Pennsylvania.
10. I have reviewed, and do not disagree, with Plaintiff's experts' factual description of how declaw procedures are performed and the anatomical impacts in terms of severing cats' nails, tissue, and ligaments. I defer to all of my veterinarians with respect to the actual method and techniques of declawing procedures. Because lions and tigers are anatomically the same as domestic cats, my understanding is that my veterinarians are correct to use the same methods.
11. While there have been instances in which medical issues for issues such as infection have occurred after declaw procedures, I do not think these have presented reasons for declining to declaw other lions or tigers. Complications, if they occur, can typically be surgically corrected and do not justify foregoing to benefits to the lions and tigers and their caregivers from declawing.

12. I believe my veterinarians followed proper protocols regarding declawing techniques used and aftercare. They typically use a surgical scalpel or a guillotine to declaw the cubs and then use tissue glue to close the wound. I disagree with Plaintiff's experts' attribution of hookworm infections to declawing aftercare—none of my other lions or tigers have suffered from infections after their declawing, and no cause of death has been officially determined. When I informed my inspector from the United States Department of Agriculture about these deaths—who has been visiting my sanctuary since its founding and has never cited me for any violations—they chose not to issue a citation, which confirms to me that these deaths did not reflect deficient veterinary care or other conduct in violation of the Animal Welfare Act. I have not seen any other lions or tigers at my sanctuary develop hookworm symptoms.
13. I have seen cubs suffer swollen paws after declawing. This is common. I am sure there have also been cubs who have experienced some symptoms associated with soreness, such as a human might experience with the extraction of a tooth.
14. Regardless, I do not believe it would be appropriate for Plaintiff to hold me responsible for veterinary procedures I did not perform.
15. I have seen lions and tigers at my sanctuary become injured through play, and other activities, just like a young child might, and so will exhibit symptoms that Plaintiff's experts think stem from declawing. I have never seen adult lions and tigers at my sanctuary show signs of lameness or psychological distress that Plaintiff's experts suggest should be typical for declawed lions and tigers.
16. The reason I have lions and tigers removed from their mothers is also for safety. It is my understanding, based on my years of experience, that lions and tigers who have been raised by humans interact more safely with both human staff and members of the public.
17. While I am aware that in more natural/wild settings, lion and tiger cubs might remain with their mothers to nurse and receive nutrients for longer than six months, I am also aware that such cubs frequently do not survive harsh environments. My approach, in which me and my staff carefully curate these animals' environments, allows all of these lion and tiger cubs to imprint on humans. For example, these cubs always stay in my home during the recovery period after their declaw

procedures, which allows for my staff to more closely monitor cubs' growth process in a stable environment via collection of data such as weight, temperature, and other observations.

18. I strongly disagree that separated cubs are deprived any necessary nutrients or antibodies, and that separated cubs will be deprived of necessary nutrients or antibodies they need for a healthy immune system. My sanctuary's practices are the equivalent of a human baby being bottle fed rather than breast fed. We formulate milk bottles based on veterinary nutritional guidance to ensure they have all the vital nutrients needed to support lion and tiger immune systems, and carefully follow available guidance regarding nutrients, bottle type, and nipple size.
19. While staff at my sanctuary may use different positions for feeding of lion and tiger cubs, there has been no documented instance of fatal injury from nursing to any cub in my care. Even with a more natural feeding position, there are risks such as eclampsia and mastitis, so some could argue that my approach of having my staff nurse lion and tiger cubs is more safe.
20. I consider it a joy to be able to share these animals with the public. I dispute that my sanctuary's conduct poses any risk to the cubs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.