



United States Department of Agriculture  
Animal and Plant Health Inspection Service

**Teachable Moments**

Legal Name: WILSTEM INC

Customer Number: 501298

Certificate Number: 32-C-0265

Inspection Date: 09-JUN-2021

Site Number: 001

Inspector: ANNMARIE COMPTON

Section: \_\_\_\_\_

**3.131(d) Sanitation.**

There were not enough methods of pest control for flies being implemented in the Roo barn area.



CFR:3.127(d)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 2:46 PM

**Legal Name:** Wilstem Inc.

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Gaps under the perimeter fence of the veld area 5-9 inches high. Coyotes getting in and killing balckbuck and fallow deer



CFR:3.127(d)

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**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 4:24 PM

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CFR:3.127(a);3.127(b)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 2:22 PM

**Legal Name:** Wilstem Inc.

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Three camels in open pasture with no access to barn, shelter or trees for shade. There is no natural or artificial method to provide shade, and the opening has been closed off with wood since June 2020



CFR:2.131(d)(2)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 4:12 PM

**Legal Name:** Wilstem Inc.

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** A young child climbed onto a fence to pet a camel during the inspection with no attendant at the public feeding encounter. It took 10 mins for an keeper to arrive at the public feeding area. A second family showed up with 2 young children feeding the camel with no keeper at the feeding area.





CFR:3.127(a);3.127(b)

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CFR:3.125(a)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 3:53 PM

**Legal Name:** Wilstem Inc.

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Broken wires on the perimeter fence of the kangaroo yard with the metal points facing in towards the kangaroos.





CFR:3.125(a)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** 9/15/2020 4:04 PM

**Legal Name:** Wilstem Inc.

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** The kangaroo perimeter fence at 5ft high, wobbly and insecure in construction



Animal and Plant  
Health Inspection  
Service

February 16, 2021

Animal Care  
4700 River Road  
Riverdale, MD 20737

**SUBJECT:** Request for Investigation of Alleged Violations  
Regarding the AWA, Regulations and/or Standards

**TO:** Timothy R. Fordahl, Director  
Investigative and Enforcement Services

**FROM:** Elizabeth Theodorson, DVM  
Assistant Deputy Administrator  
Animal Care

**RE:** Potential Violation: 9 C.F.R. parts 2 and/or 3 Section

Individual(s) referring for investigation:

Customer #: 501298  
License/Registration No: 32-C-0265  
Name: Wilstem Inc.  
Address: P.O. Box 88 French Lick, IN 47432  
Location of Incident (if different than address):  
4229 U.S. Highway 150 W Paoli, IN 47454

*Summary:*

Animal Care has reason to believe Wilstem Inc. (WILSTEM) may have violated the Animal Welfare Act due to the serious noncompliances documented on an inspection report, including incidents involving the deaths of multiple animals.

*Background Information:*

From August 29 to September 14, 2020, Animal Care received four anonymous emails (as part of complaint AC20-467) regarding alleged animal welfare violations at WILSTEM. The emails included names of staff members involved, or witness to, alleged instances of negligence and mishandling that resulted in the deaths of several animals.

On September 15, 2020, AnnMarie Compton (COMPTON), an inspector with Animal Care, conducted a routine inspection at WILSTEM. COMPTON cited critical noncompliances for the following incidents:

- A staff member transported a live llama in an inappropriate manner after being directed to euthanize the animal by gunshot.
- An eland broke its neck during an unsuccessful capture attempt.
- Loose perimeter fencing allowed dogs or coyotes to enter a multi-species grazing area. Two blackbuck were found dead by staff in the grazing area due to an apparent predator attack.

*Scope and concerns:*

Animal Care has serious concerns regarding allegations made against Wilstem in the attached complaint. COMPTON authored several emails and a memo after the inspection which appear to show employees at the facility may have provided or been encouraged to provide false statements regarding the circumstances of the incidents.

Animal Care requests IES investigate the critical noncompliances documented on the inspection report and interview witnesses listed in the complaint in order to determine if the documented noncompliances, or any other critical incidents can be substantiated. In addition, Animal Care is interested in any evidence that substantiates false or fraudulent statements made by staff members to any government official.

If unrelated but additional information is discovered during this investigation that could substantiate a noncompliance with the AWA and its Regulations, notify the program point of contact to discuss next appropriate steps.

*Prior Enforcement History:*

No prior history

Attached is all relevant evidence that Animal Care collected in connection with the violation, specifically:

- Inspection reports and photos
- Anonymous complaint (AC20-467)
- License application and certificate
- Memo and emails from COMPTON related to WILSTEM

Supervisory Animal Care Specialist  
Susan Kingston (217) 379-2593  
[susan.k.kingston@usda.gov](mailto:susan.k.kingston@usda.gov)

Animal Care Inspector  
AnnMarie Compton (618) 315-3649  
[Annmarie.Compton@usda.gov](mailto:Annmarie.Compton@usda.gov)

**Please notify our staff at [ac.rss.mailbox@aphis.usda.gov](mailto:ac.rss.mailbox@aphis.usda.gov) of the case number as soon as it is assigned. If you have any questions about this request, please contact Jeremy Steele at (740) 417-1296 or [jeremy.t.steele@usda.gov](mailto:jeremy.t.steele@usda.gov).**





Animal and Plant  
Health Inspection  
Service

Emergency and  
Regulatory Compliance  
Services

Investigative and  
Enforcement Services

Riverdale, MD Office:  
4700 River Road  
Unit 85  
Riverdale, MD 20737  
Voice 301.851.2948  
Fax 301.734.4328

Raleigh, NC Office:  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606  
Voice 919.855.7080  
Fax 919.855.7090

Ft. Collins, CO Office:  
2150 Centre Avenue  
Building B-3W10  
Fort Collins, CO 80526  
Voice 970.494.7485  
Fax 970.494.7487

VIA: UPS Express Carrier  
Shipping Event: 1st

Wilstem, Inc.  
P.O. Box 88  
French Lick, IN 47432

Jerry J. Fuhs  
550 West 36th Street  
Jasper, IN 47546

February 2, 2022

## SETTLEMENT AGREEMENT

To Whom It May Concern:

We believe that you violated the Animal Welfare Act (7 U.S.C. § 2131 et seq.) (AWA), as described in the attached Settlement Agreement. Our agency, the Animal and Plant Health Inspection Service (APHIS), is responsible for enforcing the AWA, and other agriculture laws that help prevent the spread of animal and plant pests and diseases, and ensure the welfare of animals.

After providing you with an opportunity for a hearing, we may impose civil penalties of up to \$10,000, adjusted for inflation, or other sanctions, for each alleged violation described in this Settlement Agreement. We are offering you the opportunity to resolve this matter by paying an amount that is much lower than the maximum civil penalty.

*What are the terms of the Settlement Agreement?*

You should review the information in this Settlement Agreement, including the citation and notification of penalty.

If you agree to waive your right to a hearing and pay the penalty, then do the following:

- Pay the amount due, \$8,000, by **March 4, 2022**. You can pay by check, money order, or credit card. For your convenience, we have included additional instructions for making payments.
- If you are unable to pay the full amount due by **March 4, 2022**, you may be eligible for a payment plan. To request a payment plan, you must use the enclosed form to submit a written response to this letter by **March 4, 2022**, that indicates you wish to pay the penalty and waive your right to a hearing. You must also submit a copy of your most recent federal tax return. As part of your response, please include a phone number and an email address so that we may contact you.



*What are my other options?*

If you do not agree with the terms of this Settlement Agreement, submit a written request for a hearing, with your Case Number, to our office by **March 4, 2022**, at 4700 River Rd., Unit 85, Riverdale, MD, 20737.

*What happens if I fail to respond?*

If we do not receive a payment or hearing request from you by **March 4, 2022**, we will forward this matter to our Office of the General Counsel for litigation.

*What should I do if I need help?*

If you have any questions concerning this letter, contact Jennifer Jones at (301) 851-2780, or call our main office at (301) 851-2948.

*I am a small business owner and have comments or concerns regarding APHIS's enforcement of animal and plant health laws. Who should I contact?*

APHIS always welcomes comments on how it can better assist small businesses. If you have comments about APHIS's enforcement of animal and plant health laws, please contact Michon Oubichon, the APHIS Small Business Ombudsperson, at (301) 851-2948. If you would prefer to comment to someone outside APHIS, you may contact the Small Business Regulatory Enforcement Ombudsman at <http://sba.gov/ombudsman>, email [ombudsman@sba.gov](mailto:ombudsman@sba.gov), or toll free at 1-888-REG-FAIR. The SBA Ombudsman's office receives comments from small businesses and annually evaluates federal agency enforcement activities for their responsiveness to the special needs of small businesses.

Sincerely,

Eileen F. Sullivan, Director  
Investigative and Enforcement Services





Wilstem, Inc.  
P.O. Box 88  
French Lick, IN 47432

### **CITATION AND NOTIFICATION OF PENALTY**

We believe that you violated the Animal Welfare Act (7 U.S.C. § 2131 et seq.) (AWA), as described below.

#### **Date of Alleged Violation: September 15, 2020**

**9 C.F.R. § 3.127(d)** Facilities, outdoor. Perimeter fence.

On or after May 17, 2000, all outdoor housing facilities (i.e., facilities not entirely indoors) must be enclosed by a perimeter fence that is of sufficient height to keep animals and unauthorized persons out. Fences less than 8 feet high for potentially dangerous animals, such as, but not limited to, large felines (e.g., lions, tigers, leopards, cougars, etc.), bears, wolves, rhinoceros, and elephants, or less than 6 feet high for other animals must be approved in writing by the Administrator. The fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the facility. It must be of sufficient distance from the outside of the primary enclosure to prevent physical contact between animals inside the enclosure and animals or persons outside the perimeter fence.

You failed to construct a perimeter fence of sufficient height to keep animals and unauthorized persons out.

During an inspection, APHIS officials observed a thirty-foot section of the perimeter fence in a wooded area of the facility with four sections of fencing that were raised five to eight inches from the ground.

The fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility.

#### **Date of Alleged Violation: August 8, 2020**

**9 C.F.R. § 3.125(a)** Facilities, general. Structural strength.

The facility must be constructed of such material and of such strength as appropriate for the animals involved. The indoor and outdoor housing facilities



shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals.

You failed to construct housing facilities of such material and of such strength as appropriate for animals. During an inspection, APHIS officials identified that a kangaroo ("Perth") escaped its enclosure by jumping over a five-foot fence. The animal was not found until two days later.

The facility must be constructed of such material and of such strength as appropriate for the animals involved. The indoor and outdoor housing facilities shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals.

**Date of Alleged Violation: May 13, 2020**

**9 C.F.R. § 2.40** Attending veterinarian and adequate veterinary care (dealers and exhibitors).

(b) Each dealer or exhibitor shall establish and maintain programs of adequate veterinary care that include:

(2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

You failed to use appropriate methods to prevent, control, diagnose, and treat diseases and injuries.

During an inspection, APHIS officials identified that after three elands escaped their enclosure, and were loose on the grounds of the facility, Wilstem, Inc. personnel attempted to recapture the animals using a tranquilizer dart gun. After hearing the sound of the dart gun, the animals ran into various areas of the facility. A female eland ran into a fence post and broke its neck. The method of recapture was not approved by the attending veterinarian and resulted in unnecessary pain, discomfort and death.

**Date of Alleged Violation: On or about February 5, 2020 or February 6, 2020**

**9 C.F.R. § 2.131(b)(1)** Handling of animals.

Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.

You failed to handle animals expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.



On or about February 5, 2020 or February 6, 2020, Wilstem, Inc. personnel euthanized a llama by dropping the live animal in a hole intended for burial and crushing its skull with an excavator bucket. The use of heavy machinery is not an approved method of euthanasia in the program of veterinary care or the attending veterinarian.

The penalty for the alleged violation(s) described above is \$8,000.



## How To Pay The Penalty

You may pay your penalty immediately through secure, online transactions or phone using American Express, Discover, Diners Club, Master Card, and Visa.

**Online.** Pay.gov allows you to make secure online payments. To submit your payment online:

1. Log on to <https://www.pay.gov>.
2. Click on **Find an Agency** in the header menu.
3. Click on *Agriculture (USDA): Animal and Plant Health Inspection Service (APHIS)*.
4. Click on Continue under Animal and Plant Health Inspection Service (APHIS) Customers.
5. Click *Continue to the Form*.
6. Complete the required information.
  - a. If you are entering the payment but you are not the person named in the Settlement Agreement, type your name into the *Point of Contact* field, and type the name of the person or company named in the Settlement Agreement into the *Customer Name* field.
  - b. If you are the person named in the Settlement Agreement and you are making the payment, type your name and (if applicable) your company's name in the *Customer Name* field, and type the same names OR the name of a person who can access payment information into the *Point of Contact* fields.
  - c. In the *Service Provided By* dropdown menu, select **Penalty/Fine Payment** and enter your **Payment Document Number** IN210001-AC and Payment Amount (in U.S. Dollars).
  - d. Click *Submit Data*.
7. Enter payment information.
8. On the *Review and Submit* page, enter the e-mail address of the *Customer Name* or *Point of Contact* that you entered on a previous page, and courtesy copy **aphis.ies.cce@usda.gov**, and then submit your payment.
9. Save confirmation screen and/or confirmation e-mail as your receipt.

**Phone.** To make a credit card payment by phone:

1. Call 612-336-3243 and speak to a Debt Management Specialist and provide the following information, when requested:
2. State your **Payment Document Number** IN210001-AC.
3. State your credit card information.





If you are unable to pay online or by phone, you may do so by U.S. Mail using a check, cashier's check, or money order.

**U.S. Mail.** To make a payment by check, cashier's check, or money order:

1. Make the check, cashier's check, or money order payable to the Treasurer of the United States.
2. Write the **Payment Document Number** IN210001-AC in the notes section on your check, cashier's check, or money order.
3. Mail your payment to:  
USDA – APHIS – GENERAL IN210001-AC  
P.O. Box 979043  
St. Louis, MO 63197-9000

### **If You Are Unable To Pay In Full**

Complete the attached form and return it to our office to request a payment plan. Please be prepared to provide us with copies of your most recent federal tax return so that we may determine whether you are eligible for a payment plan.



## AGREEMENT TO PAY AND REQUEST FOR PAYMENT PLAN

If you agree with the terms in this Settlement Agreement but cannot pay the penalty in full at this time, select one of the options below, sign the form, and return it to the following address prior to the due date of **March 4, 2022**:

USDA, APHIS, IES (General) IN210001-AC  
4700 River Road, Unit 85  
Riverdale, MD 20737

I understand that by signing this Settlement Agreement, I waive my right to a hearing. I agree to pay the penalty of \$8,000, but I am requesting a payment plan because of financial hardship. I have enclosed a copy of my most recent federal tax return. I have indicated below if I have enclosed other documents to show financial hardship:

\_\_\_\_\_ Bankruptcy filing

\_\_\_\_\_ Other (describe):  
\_\_\_\_\_  
\_\_\_\_\_

Printed Name: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_

**UNITED STATES DEPARTMENT OF AGRICULTURE**  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE  
INVESTIGATIVE AND ENFORCEMENT SERVICES

**REPORT OF INVESTIGATION**

**Case Number:** IN210001-AC

**Subject(s):** Wilstem, Inc  
*(Contact Information)* Jerry J. Fuhs, Director,  
President, and Secretary  
4229 U.S. Highway 150 West  
Paoli, IN 47454  
Mailing address:  
P.O. Box 88  
French Lick, IN 47432  
812-939-4484

Registered Agent  
Jerry J. Fuhs  
550 West 36<sup>th</sup> Street  
Jasper, IN 47546  
Mailing address:  
P.O. Box 88  
French Lick, IN 47432  
(b) (6), (b) (7)(C)

**Investigator:** (b) (6), (b) (7)(C)  
*(Contact Information)* 920 Main Campus Dr.  
Ste. 200  
Raleigh, NC 27606  
(b) (6), (b) (7)(C)

**Date of Report:** August 3, 2021

- ☒ **Substantiated allegation(s)**
- ☐ **No violation(s)**
- ☐ **Insufficient evidence**
- ☐ **Fact finding**
- ☐ **Contains Confidential Business Information**

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without prior consent from USDA APHIS Investigative and Enforcement Services.

☒ Reviewer(s) Roel Maldonado



**SYNOPSIS**

On September 15, 2020 US Department of Agriculture (USDA), Animal and Plant Health Inspection Services (APHIS), Animal Care (AC) conducted a routine inspection of Wilstem, Inc (WILSTEM) and cited eight Non-Compliant Items (NCI), five regular NCI's, and three critical NCI's, as noted on amended Inspection Report (IR) 2016090000496308 (6308).

IR 6308 stated that WILSTEM kept animals in an outdoor enclosure with no natural or artificial shade structures and in another outdoor enclosure with insufficient space for all the animals to comfortably fit in an artificial shelter. Additionally, WILSTEM prevented three camels from accessing the barn or other natural or artificial shelter.

IR 6308 cited deficiencies in two areas of WILSTEM perimeter fencing. The first area is an approximate 30' section of fence that contained four areas raised above the ground approximately five to eight inches. The bottom of the fence was loose enough to be pushed in either direction allowing animals/predators to crawl under the fence. This enclosure houses multiple free roaming species. Allegedly, predators killed two animals housed in the enclosure. The second area is the perimeter fence around the kangaroo enclosure that contained broken wires that pointed into the animal area allowing direct contact with the animals. The perimeter fence around the kangaroo enclosure measured five feet in height and failed to be structurally sound. On August 8, 2021 a kangaroo escaped this enclosure and left the WILSTEM property for approximately two days.

AC observed a child climbing onto the fence of the camel enclosure in the camel feeding area and no WILSTEM staff was present. The child hung on the fence and reached over to pet a camel.

WILSTEM representatives failed to record animal acquisitions and dispositions.

On or about May 13, 2020 three elands ran loose within WILSTEM. WILSTEM staff contacted the veterinarian at the Orange County Animal Clinic and obtained tranquilizer darts. WILSTEM staff tracked the three elands, darted the first one, and transported it back to the long barn. The remaining two elands ran into a fenced area where the second was darted. WILSTEM staff attempted to dart the third but missed. The eland ran into a fence post and died.

On or about February 5, 2020, WILSTEM staff transported an unresponsive llama to its burial site. The staff then used the excavator bucket to euthanize the llama using blunt force trauma. AC originally cited this incident as 9 C.F.R §2.40(b)(2) in IR 2016090000440562 (0562).

**BACKGROUND****Subject(s) Information**

Jerry J. Fuhs (FUHS) is the Registered Agent for Wilstem, Inc. (WILSTEM). The Indiana Secretary of State Office issued Articles of Incorporation on November 8, 1989 as a Domestic For-Profit Corporation (Exhibit 1). The Business ID is 1989110331. (b) (6), (b) (7)(C) and WILSTEM (b) (6), (b) (7)(C) stated that the tax identification number is (b) (6), (b) (7)(C) (Exhibit 2). WILSTEM's D-U-N-S number is (b) (6), (b) (7)(C) (Exhibit 3). WILSTEM is located at 4229 W. U.S. Highway 150, Paoli, IN 47454. The facility phone number is 812-936-4484.

FUHS has owned the property where WILSTEM is located for approximately 33 years (Exhibit 4). WILSTEM is an 1,100-acre facility that began as a guest ranch that provided animal encounters with domestic, wild, and exotic animals, horseback riding, zipline tours, and lodging at cabins located on the premises. WILSTEM Wildlife Park became established in 2019 (Exhibit 5). FUHS's residential and mailing address is 550 W. 36<sup>th</sup> St. Jasper, IN 47546, his cell phone number is (b) (6), (b) (7)(C) and his email address is (b) (6), (b) (7)(C)@wilstem.com. (b) (6), (b) (7)(C) and WILSTEM (b) (6), (b) (7)(C) mobile number is (b) (6), (b) (7)(C) and email address is (b) (6), (b) (7)(C)@wilstem.com (Exhibit 6). She has worked at WILSTEM since 2016. They are both the points of contact for WILSTEM.

WILSTEM holds a Class C Exhibitor License with the USDA since approximately 2017 (Exhibit 7). The Certificate Number is 32-C-0265 and the Customer Number is 501298. The mailing address for official notices and mail is P.O. Box 88, French Lick, IN 47432. The Indiana State Board of Animal Health stated that WILSTEM is listed as a farm in the HERDS database, and the federal premises ID assigned to them is 00HX4K1 (Exhibit 8).

(b) (6), (b) (7)(C) owns the Orange County Animal Clinic, located at 2840 N. St. Rd. 37, Paoli, IN 47454 since 2002 (Exhibit 9). The clinic phone number is 812-723-2553, Cooper's cell phone number is (b) (6), (b) (7)(C) and his email address is (b) (6), (b) (7)(C)@ocanimalclinic.com. (b) (6), (b) (7)(C) received his training from Purdue University, in West Lafayette, IN. His National Accreditation Number is (b) (6), (b) (7)(C) and his State of Indiana Veterinary License Number is (b) (6), (b) (7)(C). (b) (6), (b) (7)(C) has served as the attending veterinarian for WILSTEM for approximately 15 years.

**Subject(s) Previous History**

*Prior Enforcement Actions*

No violations are documented in ITEMS.

*Prior Adjudications*

No adjudications are recorded in ITEMS.



**NARRATIVE****Basis for Investigation**

On February 16, 2021 Elizabeth Theodorson DVM (Theodorson), Assistant Deputy Administrator, Animal Care (AC), sent a *Request for Investigation of Alleged Violations Regarding AWA Regulations and Standards* to Investigative and Enforcement Services (IES) (Exhibit 10). The Animal Welfare Act (AWA), 9 Code of Federal Regulations (C.F.R.) §2-3 establishes requirements concerning - attending veterinarian and adequate veterinary care, records – dealers and exhibitors, handling of animals, specifications for the humane handling, care, treatment, and transportation of warm-blooded animals, other than dogs, cats, rabbits, hamsters, guinea pigs, nonhuman primates, and marine mammals.

From August 29, 2020 to September 14, 2020 AC received four anonymous emails regarding alleged animal welfare violations at WILSTEM. The emails included names of staff members involved or witnesses to alleged instances of negligence and mishandling that resulted in the death of several animals.

On September 15, 2020 AC conducted a routine inspection at WILSTEM and cited three critical Non-Compliant Items (NCI): transporting a live llama in an inappropriate manner after being directed to euthanize the animal by gunshot; an escaped eland broke its neck during an unsuccessful capture attempt; and loose perimeter fencing allowed predators to enter a multi-species grazing area and kill two blackbucks. AC is also concerned that WILSTEM staff may have provided or been encouraged to make false statements regarding the circumstances of the incidents.

**Investigative Findings**

On April 15, 2021 Animal Care Inspector (ACI) AnnMarie Compton (Compton) stated that she received four complaints from two or three anonymous sources concerning WILSTEM (Exhibit 11). She stated the complainants wished to remain anonymous as they were either current employees or recently separated from WILSTEM. ACI Compton stated that she conducted a complete inspection and inquiry into these complaints on September 15, 2020 and filed IR 2016090000440562 (0562) on September 28, 2020 (Exhibit 12). She stated FUHS was out of town on the day of the inspection, therefore (b) (6), (b) (7)(C) WILSTEM (former) (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) at WILSTEM, accompanied ACI Compton during the inspection. ACI Compton stated that the report documented five NCIs and two critical NCIs.

**WILSTEM Appeal to 2.40(b)(2)**

October 16, 2020 FUHS and (b) (6), (b) (7)(C) submitted a letter of Appeal to IR 0562 to AC (Exhibit 13). They requested attention to the citation 2.40(b)(2) Attending Veterinarian and Adequate Veterinary Care. They requested that AC consider two dates: the first of which is February 5, 2020 regarding the euthanasia of a sick llama; and the second is May 13, 2020, the darting of three escaped elands.

FUHS and (b) (6), (b) (7)(C) stated that the llama belonged to FUHS as a privately owned animal, not listed on the USDA inventory and, therefore, not regulated by AC. They stated that the llama, the horses, and the donkeys were located outside the WILSTEM perimeter fence and not part of the drive through safari, which did not open until June 13, 2020.

FUHS and (b) (6), (b) (7)(C) submitted two "Treatment Log" sheets dated February 5, 2020 and February 6, 2020 with a handwritten label "Appendix C" in the upper right corner, to demonstrate that the attending veterinarian consulted with WILSTEM about the llama (Exhibit 14). They also submitted a bill from the Orange County Animal Clinic to further demonstrate (b) (6), (b) (7)(C) involvement (Exhibit 15). FUHS and (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) recommended euthanasia. They stated that WILSTEM management gave the three staff members instructions to euthanize the llama with the gun. FUHS and (b) (6), (b) (7)(C) submitted statements signed by the three staff members that stated they deviated from protocol and decided to move the llama prior to euthanasia (Exhibit 16, 17, & 18). They stated that the llama died in transit to the burial site.

FUHS and (b) (6), (b) (7)(C) requested that the 2.40(b)(2) citation for the May 13, 2020 death of the escaped eland be removed from the report. They stated that this citation only applied if the attending veterinarian had no awareness /knowledge of the situation. FUHS and (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) knew about the escaped elands as he provided FUHS with the tranquilizer darts. They stated that (b) (6), (b) (7)(C) attended the darting of a zebra in the same enclosure approximately two weeks prior and possibly confused the two incidents.

On December 1, 2020 a letter from AC stated that the 2.40(b)(2) citation regarding the llama remained in the report, but AC moved the citation to 2.131(b)(1) based on the information FUHS and (b) (6), (b) (7)(C) submitted with their appeal on behalf of WILSTEM (Exhibit 19). The citation was amended to read "the decision was made ...to transport the llama (while alive according to staff members) to the burial site in an unapproved and inappropriate manner." AC stated that the 2.40(b)(2) citation regarding the eland remained in the report as written. On February 16, 2021 AC report 2016090000496308 (6308) replaced IR 0562 dated September 28, 2020 (Exhibit 20).

**Complaints Filed with Animal Care**

On August 29, 2020 an anonymous individual submitted a complaint to AC via email regarding animal welfare at WILSTEM (Exhibit 21). The complainant claims that the concern is an urgent matter needing immediate attention. The complaint references 9 C.F.R. §3.127(a) and (b) Facilities, outdoor.

The narrative described WILSTEM as a licensed facility operating a drive through park and in violation of the Animal Welfare Act (AWA) by not providing shelter from inclement weather or direct sunlight to three camels. The complaint states that this as an ongoing practice.

On September 12, 2020 an anonymous individual submitted a complaint to AC via email regarding animal welfare at WILSTEM (Exhibit 22). The allegations detailed in the complaint include failure to report animal deaths, the escape of a male kangaroo, the injury and death of an emu, lack of shelter for animals, and mouse feces near animal feed containers.

On September 14, 2020 an anonymous individual submitted a complaint to AC via email regarding animal welfare at WILSTEM (Exhibit 23). The complainant claims that the concerns are an urgent matter needing immediate attention. The complaint alleges neglect, ineptitude, and willful and wanton disregard resulted in an animal death.

- On May 13, 2020 three elands escaped. WILSTEM staff successfully tranquilized two of the elands and returned them to their enclosure. The WILSTEM staff made an unsuccessful attempt to tranquilize the third. The agitated eland ran into a fence post, broke its neck, and died.
- On June 14, 2020 a fallow deer died due to a predator attack, possibly a coyote. The complaint states that no perimeter fence surrounded the primary enclosure thereby permitting the predator to breach the enclosure.
- On July 16, 2020 a guest of the WILSTEM drive through ran over an emu. WILSTEM staff euthanized the emu by gun shot.
- On August 8, 2020 a male kangaroo escaped its enclosure. WILSTEM supervisory staff reported the decision to euthanize the animal due to suspected neurological issues.

The complainant reported concerns about the handling of the kangaroo and encounters with the public. Other concerns expressed by the complainant included non-reporting/falsifying paperwork to hide animal deaths, mouse droppings found around animal feed containers, and three camels with no access to shade/shelter.

On September 14, 2020 an anonymous individual submitted a complaint to AC via email regarding animal welfare at WILSTEM (Exhibit 24). The complainant alleges cruel/inhumane treatment of animals, and the “bizarre death” of a llama at WILSTEM. The narrative states that on February 5, 2020 employees of WILSTEM used the bucket of an excavator to euthanize a sick llama by crushing its skull.



**Animal Care – Routine Inspection September 15, 2020, as documented on IR 6308****Animal Care Inspector (ACI) AnnMarie Compton (Compton)**

On September 15, 2020 ACI Compton conducted a routine inspection of WILSTEM. ACI Compton cited the following NCIs: 9 CFR §3.127(a) Facilities, outdoor; 9 CFR §3.127(b) Facilities, outdoor; 9 CFR §3.127(d) *Critical* – Facilities, outdoor; 9 CFR §3.125(a) Facilities, general; 9 CFR §2.131(d)(2) Handling of animals; 9 CFR §2.75(b)(1) Records: Dealers and exhibitors; 9 CFR §2.40(b)(2) *Critical* – Attending veterinarian and adequate veterinary care (dealers and exhibitors); and 9CFR §2.131(d)(2) *Critical*- Handling of Animals.

**9 CFR §3.127(a) and (b) Facilities, Outdoors****Shelter from sunlight and Shelter from inclement weather**

On September 28, 2020 ACI Compton reported three camels kept in a fenced pasture with no natural or artificial shade structure. The camels were denied access to an adjacent shed/barn (Exhibit 19). Inspector Compton stated that wood blocked the doors of the shed/barn. Photos of the camel enclosure show the entire area with no natural or artificial shade/shelter with the shed/barn in the background (Exhibit 25). There are 18 goats and seven sheep in two separate smaller pastures that do have shelter. The shelter in the goat pasture is not large enough for all the animals to get under without overcrowding, thereby preventing natural body movements. There is no additional shelter in the sheep/goat pastures. Inspector Compton set October 13, 2020 as the completion date for corrections. WILSTEM staff corrected the lack of access to the shed/barn during the inspection.

On May 5, 2021 FUHS stated that WILSTEM erected shade shelters for the camels on or before October 13, 2020 (Exhibit 4). FUHS stated that WILSTEM staff re-dressed the gravel inside the barn on September 15, 2020 and that they re-opened the barn the same day.

On May 5, 2021 (b) (6), (b) (7)(C) stated that WILSTEM built shade structures for the camels on or before October 13, 2020 (Exhibit 6). (b) (6), (b) (7)(C) provided receipt number 112-4759498-4032240 from Amazon.com for a September 16, 2020 order of two 12' X 16' heavy duty black knitted mesh tarps with grommets (Exhibit 26). (b) (6), (b) (7)(C) also provided receipt number 370226 from Tractor Supply Company, 889 North Gospel St., Paoli, IN 47454, for a September 18, 2020 purchase of one 12' X 16' mesh tarp (Exhibit 27). WILSTEM's General Ledger for the Period from January 1, 2020 to December 31, 2020 shows that Account number 52220-20, "Drive-Thru Safari Park", paid \$1296.00 to Fuhs Construction Company on October 2, 2020 for work completed on September 26, 2020 (Exhibit 28). Handwritten notes in the margin indicate "Construction labor for sun-shades and veld". On September 29, 2020 (b) (6), (b) (7)(C) sent an email to ACI Compton that stated, "Camel sunshade up!" (Exhibit 29). (b) (6), (b) (7)(C) attached digital image IMG\_4825.jpeg of the completed sunshade to the email (Exhibit 30). (b) (6), (b) (7)(C) stated that a WILSTEM staff member corrected the violation of 3.127(b) by opening a gate that blocked the door on the barn on September 15, 2020. She did not know which staff member opened the gate.

On May 6, 2021 WILSTEM employee (b) (6), (b) (7)(C) stated that WILSTEM used the long barn for the enclosed camel shelter prior to the construction of the new shelter (Exhibit 31). He stated that the camels' humps rubbed the door frame of the long barn as they entered. (b) (6), (b) (7)(C) stated that the new shelter is tall enough for the camels to enter without rubbing.



On May 6, 2021 (b) (6), (b) (7)(C) stated that she and (b) (6), (b) (7)(C) accompanied ACI Compton during the September 15, 2020 inspection visit (Exhibit 32). (b) (6), (b) (7)(C) stated that the camels were out in the sun and ACI Compton recommended that WILSTEM install shade cloths. (b) (6), (b) (7)(C) stated she did not know why staff members closed the barn doors, as the camels typically had access to the barn.

On May 6, 2021 (b) (6), (b) (7)(C) stated that ACI Compton pointed out that the camels needed access to the barn and outdoor shade (EXHIBIT 33). (b) (6), (b) (7)(C) stated that he did not know why WILSTEM closed the barn during the September 15, 2020 inspection. He stated "I am sure that it was a temporary reason like cleaning or something. There was no ongoing construction project in the long barn."

On May 6, 2021 (b) (6), (b) (7)(C) for Fuhs Construction, stated that on September 15, 2020 he and WILSTEM staff cleaned the barn and redressed the rock inside the long barn (Exhibit 34). He stated that staff put up gates and closed the doors to temporarily keep the animals out while they used a skid loader inside. (b) (6), (b) (7)(C) stated that during the AC inspection they were waiting for rock to be delivered.

### **3.127(d) Facilities, outdoors**

#### **Critical – Perimeter Fence**

On September 28, 2020 ACI Compton reported that loose perimeter fencing and gaps from the ground to the fence from 5"-8" in four areas would allow animals, including coyotes and dog-sized animals, access to the enclosure (Exhibit 20). Photographs show four deficient areas along the fence (Exhibits 35). This area contains multiple free roaming species such as zebu, fallow deer, blackbuck, watusi, nilgai, eland, aoudad, cattle, buffalo, scimitar oryx, llama, alpaca, and water buffalo. ACI Compton reported that two blackbucks were found dead, one on June 14, 2020 and one on September 11, 2020. WILSTEM staff suspected the deaths were due to an unknown predator. ACI Compton set a correction date of November 1, 2020.

On April 23, 2021 (b) (6), (b) (7)(C) stated that in the fall of 2020 WILSTEM made significant repairs to the perimeter fence with rock and rebar to prevent predators from traveling under the fence (Exhibit 9). He stated that they built multiple shelters for the different species and feeding areas to allow animals to feed in the dry areas. (b) (6), (b) (7)(C) stated that WILSTEM built secure stalls in the long animal shed to allow indoor confinement for isolation, treatment, or shelter from inclement weather. He stated that the stalls are secured with two separate doors to prevent escape.

On May 5, 2021 FUHS stated that he knew of the death of two blackbucks, one found on June 14, 2020 and one found on September 11, 2020, but he did not recall the exact cause of death (Exhibit 4). He stated that the fence deficiency likely allowed for a predator to enter the area. He stated that the thought process in the fence building focused on keeping animals in rather than keeping animals out.

FUHS stated that "most of the fence was in great shape", but WILSTEM performed work with a bulldozer and it is possible that some erosion occurred. FUHS explained that the WILSTEM property contained several sink holes and a karst or cave system that over time added to the erosion to create the gaps under the fence.



On May 5, 2021 [REDACTED] stated that the deficiencies in the fence likely allowed predators to enter the area and kill two blackbucks: one found dead on June 14, 2020 and the other one found dead on September 11, 2020 (Exhibit 6). She stated that ACI Compton set a correction date of November 1, 2020. She stated that WILSTEM made the corrections on or about October 13, 2020.

[REDACTED] provided a photograph of the riprap purchased and invoices from: Cave Quarries, Inc, Quality Stone and Ag Lime, 1156 N. 425 W., Paoli, IN 47454 (Exhibits 36 & 37) totaling \$689.86 for approximately 55 tons of revetment; Jasper Rural King, 1920 Lube Way, Jasper, IN 47546 for five 30-inch rebar stakes with loop, totaling \$19.95 (Exhibit 38); Springs Valley Supply for rebar pins totaling approximately \$1049.23 (Exhibit 39); Amazon.com receipts for 2 - Freeman FS9G2 9-gauge 2" glue collated barbed fencing staples (1000 count) and one Freeman PFS9 pneumatic 9-gauge 2" ergonomic and lightweight fencing stapler with quick release and case, orange (2 pack) totaling approximately \$799.84 (Exhibit 40) [REDACTED] provided The Wilstem Inc General Ledger for the Period from January 1, 2020 to December 31, 2020 that shows Account number 52220-20, "Drive-Thru Safari Park",

- paid \$1296.00 to Fuhs Construction Company on October 16, 2020 for work completed on October 10, 2020;
- \$972.00 to Fuhs Construction Company on October 30, for work completed on October 24, 2020; and
- \$324.00 to Fuhs Construction Company on November 27, 2020 for work completed on November 21, 2020 (Exhibit 17). Handwritten notes in the margin indicate "Construction labor for sun-shades and veld".

On May 6, 2021 [REDACTED] stated that he knew of two blackbucks killed by predators on the "veld" (Exhibit 31). He stated that he found one in the late summer of 2020 and the other in the fall of 2020. He picked up the carcasses and then gave them to [REDACTED] for disposal. [REDACTED] stated he heard of other animals missing but did not have firsthand knowledge of the incidents. He stated that he did not fill out any forms or make any other type of report.

[REDACTED] stated that the construction of the perimeter fence did not take priority over other tasks and that the fence building occurred quickly and without attention to detail. [REDACTED] stated that a tractor hit a section of the fence that remained damaged until after the September 15, 2020 inspection. He stated that since the September 15, 2020 inspection WILSTEM put down riprap and staked down other areas of the fence. [REDACTED] stated that he finds addressing issues with FUHS difficult and is usually referred to [REDACTED] (b) (6), (b) (7)(C). He stated that he is told the problem(s) "will be taken care of", but he feels that they are delayed or "pushed to the back burner". [REDACTED] stated that WILSTEM hired [REDACTED] to manage the animals and to be responsible for the "veld". He stated that at one point he helped [REDACTED] with these duties, but when he expressed his opinion WILSTEM reassigned him to another area.

On May 6, 2021 [REDACTED] stated that rain and erosion likely caused the gaps under the perimeter fence and that she told FUHS and [REDACTED] (b) (6), (b) (7)(C) that those areas needed to be repaired (Exhibit 32). She stated that WILSTEM corrected the problem after the September 15, 2020 inspection. [REDACTED] stated that she discussed the future installation of hot wire or chain link skirts with FUHS and [REDACTED] (b) (6), (b) (7)(C).

On May 6, 2021 [REDACTED] (b) (6), (b) (7)(C) stated that WILSTEM likely installed the perimeter fence in the early part of 2020, "probably the winter" (Exhibit 33). He stated that due to the terrain and erosion from rain, the fence contained "some five to eight-inch gaps" along the bottom. After the September 15,



2020 AC inspection WILSTEM placed riprap in the washed-out areas and other gaps. He stated that they also staked down the bottom and strengthened the fence.

(b) (6), (b) (7)(C) stated that he knew coyotes killed some of the animals, "I know of two animals, I think blackbucks, but I do not know of any others." He stated that WILSTEM bought a night vision camera and purchased snares to eradicate the predators (Exhibits 41 & 42). He stated that WILSTEM snared approximately 10 coyotes. (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) oversees the veld and checking the fence is part of her duties.

### **3.125(a) Facilities General**

#### **Structural Strength**

On September 28, 2020 ACI Compton reported that the perimeter fence around the kangaroo enclosure contained broken wires that pointed into the enclosure and did not meet height, or structural soundness requirements (Exhibit 20). Photographs taken by ACI Compton show the broken wire, the fence height, and the insecure construction of the fence (Exhibit 43). On or about August 8, 2020 a kangaroo named 'Perth' escaped over the fence during a public feeding encounter and left the property for two days.

On April 15, 2021 ACI Compton stated that during the September 15, 2020 inspection (b) (6), (b) (7)(C) stated that he received guidance and darting medications from (b) (6), (b) (7)(C) for the escaped kangaroo (Exhibit 11). He stated to her that he darted the animal and it disappeared. He stated they were unable to locate it until the next day when he darted it again. ACI Compton stated that (b) (6), (b) (7)(C) darted the kangaroo, captured it, and transported to (b) (6), (b) (7)(C) office where it was euthanized.

ACI Compton stated that, during a conversation with (b) (6), (b) (7)(C) on or about September 17, 2020 no one picked up tranquilizer medication for the kangaroo. He stated that WILSTEM informed him of the escape. (b) (6), (b) (7)(C) stated that, on August 10, 2020, WILSTEM staff brought the kangaroo to the clinic already dead from a gunshot.

On April 23, 2021 (b) (6), (b) (7)(C) stated that that he observed the kangaroo exhibiting signs of circling to one side and a history of weight loss, anorexia, and signs of restlessness prior to its escape on or about August 8, 2020 (Exhibit 9). (b) (6), (b) (7)(C) provided a Patient History Report for a kangaroo owned by WILSTEM with treatment dates ranging from June 29, 2017 to June 2, 2020 (Exhibit 44).

(b) (6), (b) (7)(C) stated that WILSTEM presented the kangaroo to him on August 10, 2020 for necropsy. The Patient History Report dated August 10, 2020 details the necropsy results (Exhibit 45). (b) (6), (b) (7)(C) stated there were no gross lesions in the thorax or abdomen and that the lungs, liver, spleen, and heart were all within normal limits. He did not grossly examine the brain stem and spinal cord. (b) (6), (b) (7)(C) added, "[w]ith history of weight loss, no oral lesions or teeth abnormalities and acute onset of neurologic disease with circling. I believe the animal suffered from a spinal or brainstem mass." The Patient History Report also listed four-3cc darts, one-BAM kit, and one-Necropsy Large Animal, dated August 10, 2020.

On April 23, 2021 former WILSTEM employee (b) (6), (b) (7)(C) stated that 'Perth' the kangaroo escaped and (b) (6), (b) (7)(C) shot it (Exhibit 46). (b) (6), (b) (7)(C) stated that the kangaroo exhibited signs of weight loss, pacing around the enclosure, and loss of interest in breeding. To her knowledge the veterinarian examined 'Perth' but did not provide a plan of care. (b) (6), (b) (7)(C)



provided a hand drawn map of the WILSTEM property showing the approximate location of the kangaroo enclosure and the front gate (Exhibit 47).

On May 5, 2021 FUHS stated that the kangaroo's enclosure fence measured five feet high and was not sturdy (Exhibit 4). He stated that WILSTEM replaced the kangaroo enclosure fencing with eight feet high fencing and taped any protruding wires.

He stated that a kangaroo, named 'Perth' escaped by jumping out of its enclosure. FUHS stated that (b) (6), (b) (7)(C) examined this animal and determined a possible neurological disorder and recommended euthanasia. FUHS stated that the kangaroo acted erratic and "flopped" over the fence and out the gate. FUHS stated that WILSTEM staff located the animal after about six hours of searching and they darted him. FUHS stated that the kangaroo got up and "took off". At approximately 2:00 a.m. they decided to suspend the search until morning. FUHS stated that WILSTEM staff located the animal on an adjacent property the next morning. He stated that they decided to euthanize the kangaroo by gun shot at that point. FUHS stated that he transported the animal to (b) (6), (b) (7)(C) for necropsy. FUHS stated that WILSTEM staff may call the veterinarian at any time if needed.

On May 5, 2021 (b) (6), (b) (7)(C) stated 'Perth' was under the care of (b) (6), (b) (7)(C) for a possible neurological issue prior to his escape (Exhibit 6). She stated that euthanasia was recommended. Laboratory results from ANTECH, Accession number CHAV00167121, indicate that (b) (6), (b) (7)(C) of Orange County Animal Clinic, drew blood from a kangaroo owned by WILSTEM on or about May 30, 2020 (Exhibit 48). (b) (6), (b) (7)(C) stated that a kangaroo named 'Perth' escaped by jumping over the enclosure fence. She stated that WILSTEM staff recaptured him within 24 hours by euthanasia.

ACI Compton set a correction date of October 13, 2020 for this deficiency. (b) (6), (b) (7)(C) stated that WILSTEM completed the correction on September 16, 2020 by tightening the fence and increasing the height to eight feet. (b) (6), (b) (7)(C) provided Tractor Supply Company, 889 N. Gospel St. Ste 1, Paoli, IN 47454, receipt number 369982, dated September 16, 2020, shows the purchase of wire 14G ¼ mile fence for \$22.99 (Exhibit 49). Handwritten notes indicate "maint. Grounds" and "\*kangaroo fencing". Photographs show the improvements made to the kangaroo enclosure fence (Exhibit 50).

On May 6, 2021 (b) (6), (b) (7)(C) stated that WILSTEM constructed the kangaroo enclosure quickly and "not very sturdy" (Exhibit 31). He stated that one kangaroo escaped over the fence during open hours of the park. (b) (6), (b) (7)(C) noted that the kangaroo seemed anxious, but otherwise healthy when he escaped. He stated that the kangaroo was hopping quickly around the enclosure and "kind of flipped over the fence", escaped the perimeter fence and exited through the entrance gate.

(b) (6), (b) (7)(C) participated in the search for 'Perth', but he did not find him. He stated that to his knowledge (b) (6), (b) (7)(C) located the animal. (b) (6), (b) (7)(C) stated that sometime later WILSTEM staff received a message informing them of the euthanasia of 'Perth' due to neurological issues.

On May 6, 2021 (b) (6), (b) (7)(C) stated that her responsibilities did not include the "Roo enclosure", but she did mention to FUHS that the kangaroo enclosure fence measured five feet high and that the regulations in Florida, where she had previously worked, required fencing at least eight feet high (Exhibit 32). She stated that WILSTEM staff expressed concern about 'Perth' possibly suffering from neurological issues, as he demonstrated abnormal signs of agitation and nervousness. (b) (6), (b) (7)(C) stated that staff darted



'Perth' on an earlier date and transported him to the attending veterinarian, (b) (6), (b) (7)(C) of the Orange County Animal Clinic.

(b) (6), (b) (7)(C) stated that she did not see 'Perth' escape but received a call to help look for him. She recalled that FUHS, (b) (6), (b) (7)(C), possibly another WILSTEM staff member, (b) (6), (b) (7)(C), and herself looked for several hours before she returned to the park to complete the daily shut down activities for her area. (b) (6), (b) (7)(C) returned to the search sometime later when the animal was darted; the dart failed to sedate it and it "took off". She stated that the search team continued for several more hours until dark. She rejoined (b) (6), (b) (7)(C) in the search the next morning when they received notice that the kangaroo was off the WILSTEM property. (b) (6), (b) (7)(C) stated that each time they tried to approach the kangaroo he seemed agitated and ran away before (b) (6), (b) (7)(C) could dart him with tranquilizer. She stated that since WILSTEM and (b) (6), (b) (7)(C) had previously discussed euthanasia for the neurological issues they made the decision to euthanize in order to prevent injury to either the animal or human in the event of a traffic collision.

On May 6, 2021 (b) (6), (b) (7)(C) stated that WILSTEM erected the outdoor 'Roo' enclosure fence quickly as a temporary fence and some of the wire did not get wrapped around the brace post (Exhibit 33). He stated that after the September 15, 2020 inspection WILSTEM replaced all the five feet high kangaroo enclosure fence with eight feet high fencing.

(b) (6), (b) (7)(C) recalled, prior to the escape, the kangaroo "acting odd" and helping FUHS put the animal in his truck to transport to (b) (6), (b) (7)(C) for an exam. (b) (6), (b) (7)(C) stated that the large male kangaroo escaped on (b) (6), (b) (7)(C) day off, and that he received a phone call late in the day to come to WILSTEM and help look for 'Perth'. He stated that FUHS, (b) (6), (b) (7)(C) and himself looked for the kangaroo. (b) (6), (b) (7)(C) stated that he notified the Orange County Sheriff's office. He recalled that at approximately 8:00 p.m. he received a call that someone spotted the kangaroo in the area of FUHS's cabin. (b) (6), (b) (7)(C) stated "I shot him with a tranquilizer dart, and he took off". He stated that FUHS, the sheriff's deputies and himself searched until dark. (b) (6), (b) (7)(C) stated the next morning he received notice of the kangaroo on a neighboring property. (b) (6), (b) (7)(C) stated that after a discussion with (b) (6), (b) (7)(C) they decided to euthanize the animal. (b) (6), (b) (7)(C) stated, "I was able to shoot him with my rifle". He and FUHS then transported the kangaroo to (b) (6), (b) (7)(C) office for necropsy.

### **2.131(d)(2) Handling of animals**

On September 28, 2020 ACI Compton reported that during the September 15, 2020 inspection she observed a child climbing the fence of the camel enclosure at the feeding area with no attendant present (Exhibit 20). ACI Compton stated that the child reached over the fence to touch the camel. Photographs taken by ACI Compton show the child feeding the camels with no attendant present (Exhibit 51). ACI Compton stated that WILSTEM failed to provide a barrier, distance, or an identifiable keeper. WILSTEM failed to show that a WILSTEM staff had been assigned to the camel encounter area and the amount of time that this area had been left unattended. WILSTEM corrected this deficiency during the inspection.

On May 5, 2021 FUHS stated that he thought the staff member responsible for the camel encounter, on September 15, 2020, took a relief break without calling for a replacement (Exhibit 4). He stated that another WILSTEM staff member covered the post during the inspection.



On May 5, 2021 [REDACTED] stated that she did not know why the attendant left his/her post with the camels during the September 15, 2020 inspection (Exhibit 6). She stated that visitors can purchase carrots to feed the camels. This area is meant to have an attendant for the animal encounter; therefore, there is no barrier fence. [REDACTED] stated that WILSTEM sent a replacement staff member during the inspection visit. [REDACTED] provided a sample of the WILSTEM Daily Schedule with no date listed (Exhibit 52).

On May 6, 2021 [REDACTED], since she escorted ACI Compton during the inspection, stated that a child climbed the fence and came face to face with a camel with no attendant present (Exhibit 32). She stated that the attendant went to lunch and WILSTEM rectified the situation immediately.

On May 6, 2021 (b) (6), (b) (7)(C) since he escorted ACI Compton during the inspection, stated that a child climbed the fence and came face to face with the camels with no attendant present (Exhibit 33). (b) (6), (b) (7)(C) stated he thought the attendant went to lunch and left his/her post before the replacement arrived. He stated that when he sees this type of situation, he calls for someone to cover the post.

### **2.75(b)(1) Records: Dealers and exhibitors**

On September 28, 2020 ACI Compton reported that facility staff stated that animal births, deaths, euthanasia's, purchases, and sales occurred with no corresponding acquisition/disposition forms (Exhibit 20). ACI Compton stated that the lack of records hinders proper management and traceability of regulated animals. On September 15, 2020 ACI Compton reported that multiple animals are missing from the WILSTEM inventory list.

On April 15, 2021 ACI Compton stated that WILSTEM failed to report nine incidents of animal deaths and escapes to AC. She stated that they omitted information, there were no health records available for certain incidents, and that WILSTEM claimed to not know to keep records (Exhibit 11).

On April 23, 2021 (b) (6), (b) (7)(C) stated that WILSTEM made changes and improvements to the overall conditions, animal husbandry, and record keeping since the September 15, 2020 AC inspection (Exhibit 9). He stated that prior to this visit WILSTEM practiced limited record keeping, health care, and animal husbandry. (b) (6), (b) (7)(C) stated that WILSTEM instituted a Plan of Veterinary Care years ago and began to rigidly follow the plan since September 15, 2020.

(b) (6), (b) (7)(C) stated that he walks through the "Roo" barn and examines each species, additionally he rides through the drive through area with WILSTEM staff to discuss body condition scores and any problems that may arise. He stated that he did not know of any animals not receiving supplemental feed to encourage interaction with WILSTEM guests. (b) (6), (b) (7)(C) stated that he did not recall any thin animals that did not receive veterinary services from him. He stated that when veterinary services are needed, he records the medications and plan for further treatment/care on the Veterinary Care sheets (b) (6), (b) (7)(C) provided a copy of the Program of Veterinary Care Instructions for 16 different species: antelope, (including eland, nilgai, and oryx), aoudad, bovine (including bison, water buffalo, and watusi cattle), caprine, cavy, camel, Cervidae (including black buck and fallow deer), equine, giraffe (not dated), hedgehog, kangaroo (not dated), llama and alpaca, lemur, ovine, porcupine, sloth, wallaby, and zebra (Exhibit 53).

On May 5, 2021 Former WILSTEM employee (b) (6), (b) (7)(C) stated that maintaining the USDA required paperwork fell under his duties as (b) (6), (b) (7)(C) from approximately 2013



until approximately May 2019 (Exhibit 54). (b) (6), (b) (7)(C) stated that FUHS taught him how to complete the forms. He stated that he kept record of new animal arrivals as well as any animal deaths.

(b) (6), (b) (7)(C) stated that he did his job at WILSTEM the way FUHS told him. He stated that he retained his position at WILSTEM at the discretion of FUHS. (b) (6), (b) (7)(C) stated that he left WILSTEM prior to the opening of the drive-thru and before many of the other reported events took place.

On May 6, 2021 (b) (6), (b) (7)(C) stated that on or about 2018/2019 he and (b) (6), (b) (7)(C) attempted to keep up the paperwork for WILSTEM (Exhibit 33). (b) (6), (b) (7)(C) stated that ACI Juan Arango demonstrated the use of the acquisition/disposition forms and the Program of Veterinary Care forms. (b) (6), (b) (7)(C) stated that he assisted with the record keeping until (b) (6), (b) (7)(C) came on board and took over the record keeping.

On May 5, 2021 FUHS stated that WILSTEM did not have complete and accurate records due to a lack of staff (Exhibit 4). He stated that (b) (6), (b) (7)(C) began bringing the records up to date since the September 15, 2020 inspection. (b) (6), (b) (7)(C) stated that WILSTEM did not have complete and accurate records due to a lack of staff and the shutdown due to COVID-19 (Exhibit 6). (b) (6), (b) (7)(C) stated that WILSTEM retained receipts from all animals purchased or sold but the acquisition/disposition forms were not completed. She stated that since the September 15, 2020 inspection, all records were up to date. She stated that (b) (6), (b) (7)(C) reports all births/deaths from the "veld" area and WILSTEM employee, (b) (6), (b) (7)(C) reports all births/deaths from the "Roo's and Crews" barn. (b) (6), (b) (7)(C) stated that she updates the records on a weekly basis. (b) (6), (b) (7)(C) provided a photograph of the record keeping system now in place and the Plan of Veterinary Care sign off sheet that demonstrates (b) (6), (b) (7)(C) visits to WILSTEM since July 29, 2020 (Exhibit 55 & 56). (b) (6), (b) (7)(C) stated that since the inspection, WILSTEM staff record feeding and animal care schedules (Exhibit 31).

On May 6, 2021 (b) (6), (b) (7)(C) stated that she began working for WILSTEM in the late spring of 2020 and tasked with updating WILSTEM records (Exhibit 32). She stated that the records were current up to 2019 during the inspection on September 28, 2020. (b) (6), (b) (7)(C) stated that prior to her arrival a former WILSTEM employee, (b) (6), (b) (7)(C), and another unknown staff member were assigned to organize records. (b) (6), (b) (7)(C) stated that when (b) (6), (b) (7)(C) began working at WILSTEM, she assisted.

## **2.131(b)(1) Handling of Animals**

### **Critical - Llama**

WILSTEM is reporting that the llama incident occurred on February 5, 2020 (Tuesday) and (b) (6), (b) (7)(C) has stated that the incident occurred on February 6, 2020 (Wednesday). Additionally, the 2 documents generated by (b) (6), (b) (7)(C) have one dated February 5 and the other February 6. Due to the lack of recordkeeping these dates are not coinciding, but both dates are referencing the same event.

On September 28, 2020 ACI Compton reported that on or about February 5, 2020 a former WILSTEM employee utilized a mini excavator as an unapproved method of euthanasia for a sick llama (Exhibit 20). WILSTEM staff members stated that they received approval to euthanize by gunshot, however, the former employee decided to load the live llama in the excavator bucket and transport it to the burial site where he dropped the animal in the prepared hole and crushed its skull with the excavator bucket. ACI Compton reported that WILSTEM staff were able to access the gun but chose not to use



it. ACI Compton stated that during the exit interview FUHS stated that he intended to appeal the inspection report.

On April 23, 2021 (b) (6), (b) (7)(C) stated that during a farm call to WILSTEM on or about February 6, 2020, he examined and treated a llama (Exhibit 9). He stated that he administered Banamine, and PREDEFF injections for signs of weakness and anorexia. The Patient History Report for the patient 'llama' show a Farm Call, Exam-Large Animal, 10.00 each – Banamine injection per ml, and 10.00 of PREDEFF 2x per ml (10 each) on February 6, 2020 (Exhibit 57).

(b) (6), (b) (7)(C) stated that during a subsequent farm call to WILSTEM the staff informed him of the llama's worsened condition. He stated that he recommended euthanasia at that time but WILSTEM did not call him to perform the euthanasia. (b) (6), (b) (7)(C) stated no one informed him of the method of euthanasia until a later date.

(b) (6), (b) (7)(C) stated that he did not complete the Diagnosis/Observation Treatment Log Sheet(s) dated February 5, 2020 and February 6, 2020 that I presented to him on April 23, 2020 (Exhibit 14). (b) (6), (b) (7)(C) stated that the notes made on the treatment sheets are accurate to his farm visit on or about February 6, 2020, but they are not in his handwriting and he is concerned that someone completed them without his review or his approval. He stated that his name is not on the forms, but they are suggestive that they came from him.

On May 6, 2021 Investigator Roel (b) (6), (b) (7)(C) do (Maldonado) and I met with (b) (6), (b) (7)(C) at their residence to interview (b) (6), (b) (7)(C) (Exhibit 58). While I interviewed (b) (6), (b) (7)(C) in the kitchen area, Maldonado requested (b) (6), (b) (7)(C) to allow him a few minutes to discuss a concern with some records. Maldonado presented the Diagnosis/Observation Treatment Log Sheet(s) dated February 5, 2020 and February 6, 2020 to (b) (6), (b) (7)(C) for her review (Exhibit 14). Maldonado asked if she knew who created the documents. (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) entered the information on these sheets and signed the one dated February 6, 2020. Maldonado stated that (b) (6), (b) (7)(C) added that (b) (6), (b) (7)(C) completed these documents to record the information from the attending veterinarian and that they are for WILSTEM record keeping purposes and are not meant to represent records completed by the veterinarian. These were the same documents that WILSTEM included in their appeal on October 16, 2020 to AC for IR 0562 (Exhibit 13).

On May 5, 2021 (b) (6), (b) (7)(C) WILSTEM employee, stated that on or about February 5, 2020 a female llama became ill and "laid down and would not get up" (Exhibit 59). He stated that this illness came on suddenly and he did not know of any previous illness or injury. (b) (6), (b) (7)(C) stated that he did not recall contacting (b) (6), (b) (7)(C) but that (b) (6), (b) (7)(C) made a farm call to examine the llama and recommended euthanasia. (b) (6), (b) (7)(C) stated that at the end of the day he helped two other WILSTEM employees (b) (6), (b) (7)(C) pick up and transport the llama to a burial site. He stated that they put straps around the llama and used the excavator bucket as a hoist and placed the llama in the bed of the pickup truck. (b) (6), (b) (7)(C) stated that he urged (b) (6), (b) (7)(C) to shoot the llama before they loaded it, but as a new employee they did not listen to him. (b) (6), (b) (7)(C) stated that he and (b) (6), (b) (7)(C) drove the truck and (b) (6), (b) (7)(C) followed in the excavator to dig a hole for burial. He stated that (b) (6), (b) (7)(C) remained in the truck while he got out to assist (b) (6), (b) (7)(C) stated that after (b) (6), (b) (7)(C) placed the llama in the hole, but before he removed the straps (b) (6), (b) (7)(C) dropped the bucket fast and it came down with hard impact" hitting the llama in the head. (b) (6), (b) (7)(C) stated that "it all happened very fast". He



stated that the animal did not struggle. [REDACTED] stated that they intended to shoot the llama and called "Jeff the bear guy", Jeff Watson (Watson) to let him know about the noise of a gunshot

On February 5, 2020 [REDACTED] stated that someone informed FUHS about the incident, he did not know who. [REDACTED] stated that FUHS called him into the office and reprimanded him. FUHS explained to him that what he did was wrong and expressed his disappointment for not doing more to stop [REDACTED]. [REDACTED] stated that he felt bad that he "didn't take more of a stand". He stated that FUHS issued him a write up and a three-day suspension without pay. [REDACTED] stated the FUHS also handed him a paper to sign that stated that the llama died in the truck while being transported. [REDACTED] stated that is an incorrect statement. He stated that he did not feel that the llama died until it was hit by the bucket.

On May 5, 2021 FUHS stated that a llama became sick and WILSTEM staff called [REDACTED] (Exhibit 4). FUHS stated that it is possible that [REDACTED] made the phone call to [REDACTED]. He stated that [REDACTED] recommended euthanasia.

FUHS stated that former employee(s) [REDACTED], and current employee, [REDACTED] loaded the llama into a truck and moved to a burial site. FUHS stated he gave instructions to euthanize the animal and bury it. FUHS stated that a conversation with [REDACTED] revealed that the llama was moved prior to euthanasia.

FUHS stated that he called [REDACTED] into his office individually to question them about the events. FUHS stated that each of the three stated that the llama died while being transported prior to being placed in the hole. FUHS stated that he drafted statements according to what [REDACTED], and [REDACTED], reported to him (Exhibits 16, 17, & 18). The statements included acknowledgment of proper procedure, euthanasia then disposal. FUHS stated that all three signed the statements dated February 6, 2020. FUHS stated that he suspended [REDACTED] for three days without pay and suspended [REDACTED] for five days without pay.

On May 4, 2020 I spoke via telephone with former WILSTEM employees, [REDACTED] [REDACTED], to request an interview (Exhibit 60). [REDACTED] stated that he is self-employed and did not have time to meet. [REDACTED] stated that he did not want to "talk about Jerry" and refused to meet with me.

On May 5, 2020 [REDACTED] stated that WILSTEM staff euthanized a llama by blunt force trauma (Exhibit 6). [REDACTED] stated that euthanasia in this manner is not a WILSTEM directive and that there is now a euthanasia plan in place that follows the AVMA guidelines. She stated that [REDACTED] aided in the development of the plan. She provided a copy of the Humane Euthanasia Guidelines – Wilstem Wildlife Park (Exhibit 61).

#### **2.40(b)(2) Attending Veterinarian and Adequate Veterinary Care**

##### **Critical - dealers and exhibitors - Escaped Elands**

On September 28, 2020 ACI Compton reported that three elands escaped from their enclosure at WILSTEM (Exhibit 20).

On April 15, 2021 ACI Compton stated that on or about May 13, 2020 three elands escaped from their enclosure and ran loose on the WILSTEM grounds (Exhibit 11). ACI Compton stated that during the exit interview FUHS and [REDACTED] stated that the attending veterinarian observed and advised



WILSTEM staff during the darting of the eland. She stated that they provided the names of staff member (b) (6), (b) (7)(C) and bear contractor, Watson, to corroborate their account of the events. She stated that (b) (6), (b) (7)(C) and Wa (b) (6), (b) (7)(C) support the FUHS and (b) (6), (b) (7)(C) account of events. ACI Compton stated that she asked (b) (6), (b) (7)(C) about his involvement with the incident and he stated that WILSTEM did not consult him on this matter.

On April 23, 2021 (b) (6), (b) (7)(C) stated that he received a call from WILSTEM needing tranquilizer darts as three elands escaped their enclosure and they needed to recapture them (Exhibit 9). (b) (6), (b) (7)(C) stated that he provided the tranquilizer loaded darts, but he did not go to the facility to assist. He stated that FUHS confused two different incidents that occurred within a short time of each other. (b) (6), (b) (7)(C) stated that he met with FUHS and (b) (6), (b) (7)(C) to discuss the incident. (b) (6), (b) (7)(C) stated that he reminded FUHS of a visit he made for a zebra that took place in the same enclosure. He stated that he participated in the creation of a statement stating that he did not attend the darting and re-capture of the elands (Exhibit 62).

On May 5, 2021 FUHS stated that on May 13, 2020 three elands escaped their enclosure (b) (6), (b) (7)(C) and someone failed to latch the gate (Exhibit 4). FUHS stated that WILSTEM staff called (b) (6), (b) (7)(C) and FUHS went to the clinic to pick up tranquilizer darts. He stated that WILSTEM added safety clips to the enclosure doors.

On April 23, 2021 (b) (6), (b) (7)(C) stated that in or around May 2020 three elands escaped their enclosure (Exhibit 46). She stated that WILSTEM staff located one by the creek and tranquilized it. (b) (6), (b) (7)(C) stated that she assisted with transporting the first eland back to the enclosure and that she stayed with the animal until the tranquilizer wore off. (b) (6), (b) (7)(C) stated that the tranquilizer took approximately 45-50 minutes to wear off.

On May 5, 2021 Contracted Grizzly Bear Exhibitor, (b) (6), (b) (7)(C), stated that on or about May 13, 2020 three elands escaped their enclosure (Exhibit 63). (b) (6), (b) (7)(C) stated that FUHS informed him of the animals' escape. He stated that he joined the search for the elands. He stated that (b) (6), (b) (7)(C) darted one of the elands and moved it back to its enclosure. (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C), and himself continued to track the remaining two elands. (b) (6), (b) (7)(C) located the elands and shouted through the woods to alert (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) darted one of the elands and both elands began to run through the woods and into a fenced area. He stated that (b) (6), (b) (7)(C) attempted to dart the third eland but missed. (b) (6), (b) (7)(C) stated that the third eland ran into a fence post and broke its neck. (b) (6), (b) (7)(C) stated that he did not think it necessary to dart the third eland as it was panicked and in a contained/fenced area.

On May 6, 2021 (b) (6), (b) (7)(C) stated that three elands escaped their enclosure but, to his knowledge, did not leave WILSTEM property (Exhibit 33). He stated that upon arriving at work someone called and informed him of the escape. (b) (6), (b) (7)(C) stated that he and (b) (6), (b) (7)(C) began looking for the elands. They found the first eland, darted it, and transported it back to the barn. (b) (6), (b) (7)(C) stated that they looked for approximately two more hours until they located the remaining two elands. The two elands ran in to an enclosure where they were trapped. (b) (6), (b) (7)(C) stated that he darted one and it "went down". The third eland "freaked out" and he took a shot at her. That dart went over her back and she ran headfirst into a fence post and broke her neck.

On May 6, 2021, (b) (6), (b) (7)(C) stated that on May 13, 2020 he made his morning rounds through the barns and discovered that three elands escaped (Exhibit 34). He checked the barn the afternoon before and the three elands were in the quarantine stall. (b) (6), (b) (7)(C) stated that the evening feeding crew came through after him. He did not know if someone forgot to latch the gate or if the latch failed. He checked with a WILSTEM staff member to find out if someone moved the elands. (b) (6), (b) (7)(C) stated that he and (b) (6), (b) (7)(C) notified FUHS and (b) (6), (b) (7)(C) could not come out right away, therefore FUHS went to pick up the tranquilizer darts.

(b) (6), (b) (7)(C) stated that he and (b) (6), (b) (7)(C) tracked the elands to behind the elephant barn where they darted the first eland. (b) (6), (b) (7)(C) provided a hand drawn map of the WILSTEM facility and the path that the elands took into the dry lot (Exhibit 64). The two elands ran out of the elephant enclosure and around the outside of it. This worked as a funnel to herd them into the zebra enclosure. They still could not get them into the barn. (b) (6), (b) (7)(C) darted the second eland, but the wind blew the dart over the back of the third and it ran headfirst into a fence post and broke its neck.



These findings substantiate the following alleged violation(s):

**9 C.F.R. §3.127(a) and (b) Facilities, outdoor – Shelter from sunlight and Shelter from inclement weather**

On or around September 15, 2020, WILSTEM failed to provide sufficient shade by natural or artificial means for three camels, 18 goats, and 7 sheep to protect themselves from direct sunlight.

On or around September 15, 2020, WILSTEM failed to provide natural or artificial shelter for three camels to afford them protection and prevent discomfort.

**9 C.F.R. §3.127(d) Facilities, outdoor – Perimeter fence**

On or around September 15, 2020, WILSTEM failed to provide a perimeter fence constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the facility. The fencing had several areas where predatory animals entered the primary outdoor enclosure.

**9 C.F.R. §3.125(a) Facilities, general – Structural strength**

WILSTEM failed to provide a facility constructed of material and strength appropriate for the animals involved. The outdoor housing facilities failed to be structurally sound and maintained in good repair in order to protect a kangaroo. On August 8, 2020, a kangaroo escaped and WILSTEM decided to shoot it as a means of recapturing.

**9 C.F.R. §2.131(d)(2) Handling of animals**

On September 15, 2020, WILSTEM failed to provide a responsible, knowledgeable, and readily identifiable employee or attendant during periods of public contact. A customer and minor climbed the enclosure fence and came into direct contact with a camel.

**9 C.F.R. §2.75(b)(1) Records: Dealers and exhibitors**

On or around September 15, 2020, WILSTEM failed to make, keep, and maintain records or forms for the acquisition and disposition of h animals.

**9 C.F.R. §2.131(b)(1) Handling of Animals**

WILSTEM failed to handle an animal as expeditiously and carefully as possible in a manner that did not cause trauma, behavioral stress, physical harm, or unnecessary discomfort. On or around February 6, 2020, WILSTEM transported and euthanized a sick llama inhumanely and not as prescribed by the attending veterinarian.

**9 C.F.R. §2.40(b)(4) Attending Veterinarian and Adequate Veterinary Care (dealers and exhibitors)**

WILSTEM failed to provide adequate guidance to personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and

euthanasia on or about February 6, 2020 when WILSTEM staff members euthanized a llama by blunt force trauma with an excavator bucket.

WILSTEM failed to provide adequate guidance to personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, tranquilization, and euthanasia on or about May 13, 2020 when they unsuccessfully attempted to dart a panicked eland after it returned to a fenced enclosure near the long barn.

**9 C.F.R. §2.40(b)(2) Attending Veterinarian and Adequate Veterinary Care (dealers and exhibitors)**

WILSTEM failed to assure that the attending veterinarian has appropriate authority to oversee the adequacy of other aspects of animal care and use. On or about May 13, 2020, WILSTEM failed to successfully dart and eland. The eland ran into a fence post and died.

These findings indicate that the evidence does not support a violation of the following section(s):



**MITIGATING AND/OR AGGRAVATING FACTORS**

Mitigating – On April 23, 2021 (b) (6), (b) (7)(C) stated that he observed improvements regarding overall conditions, animal husbandry, and record keeping at WILSTEM since the AC inspection on September 15, 2020 (Exhibit 9). He stated that prior to the AC inspection WILSTEM conducted limited record keeping, animal health care, and husbandry practices.

(b) (6), (b) (7)(C) stated that, after the September 15, 2020 AC inspection, WILSTEM reinforced the fencing and made significant repairs with rock and rebar to prevent predators from traveling under the fence. WILSTEM built multiple shelters for different species, built feeding areas to allow animals to eat in dry areas rather than in the mud, built secure stalls in the long animal barn to allow animals to be confined as needed for isolation, treatment or shelter, and the stalls are secured with two separate doors to prevent escape.

(b) (6), (b) (7)(C) stated that WILSTEM put a Plan of Veterinary Care in place “a number of years” ago, which they have rigidly followed since the fall of 2020. He walks through the “Roo” barn and rides through the drive-thru section with WILSTEM staff to discuss body condition scores and to address any problems. He treats the animals as needed and records the medications administered on the Veterinary Care Sheets. Plans for further treatment are recorded on the Veterinary Care Sheets. The animal is separated and rechecked and/or finalized at the next visit.

**ADDITIONAL INFORMATION**

<b><u>WITNESS LIST</u></b> <i>Provide First, MI and Last Name with Complete Address</i>		
Name	Title	Address / Phone Number
(b) (6), (b) (7)(C)	Former Wilstem, Inc Employee	(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)	WILSTEM (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) @wilstem.com
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Wilstem, Inc	(b) (6), (b) (7)(C)
AnnMarie Compton	Animal Care Inspector	USDA APHIS Animal Care 4700 River Road Riverdale, MD 20737 618-315-3649 Annmarie.compton@usda.gov
(b) (6), (b) (7)(C)	Former Wilstem, Inc Employee	(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	Orange County Animal Clinic 2840 N. St. Rd.37 Paoli, IN 47454 812-723-2553 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)@ocanimalclinic.com
(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)	(b) (6), (b) (7)(C)
Roel Maldonado	Supervisory Investigator, Badge # 3525	USDA APHIS ERCS IES 920 Main Campus Drive, St 200 Raleigh, NC 27606 919.855.9080 roel.maldonado@usda.gov
(b) (6), (b) (7)(C)	Fuhs Construction – (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) Wilstem, Inc.	(b) (6), (b) (7)(C) @wilstem.com



(b) (6), (b) (7)(C)	Wilstem, Inc. Employee	(b) (6), (b) (7)(C)
(b) (6), (b) (7)(C)	Wilstem, Inc. Employee	(b) (6), (b) (7)(C)
Jeff Watson	Wilstem, Inc. Contract Exhibitor	732 W. Porter Ridge Rd. Spencer, IN 47460 (b) (6), (b) (7)(C)

**CASE REPORT DISTRIBUTION (cc)**

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**CASE CONCURRING OFFICIAL(S)**

**Concurring Program Official(s)**

Robert Gibbens, AC Associate Deputy Administrator

**Case Updates**

(b) (6), (b) (7)(C) Primary Investigator

Roel Maldonado, IES Area Director

Yosarah Stephens, IES Deputy Field Operations Director

Timothy Fordahl, IES Director of Field Operations



<b><u>EXHIBIT LIST</u></b>			
<b>Exhibit #</b>	<b>Description</b>	<b>Date</b>	<b>Total Pages</b>
1	Indiana Secretary of State – Business Information	03/12/2021	1
2	Email from (b) (6), (b) (7)(C) with W-9	07/14/2021	2
3	Duns and Bradstreet Financial Report	03/12/2021	8
4	Jerry Fuhs - Affidavit	05/05/2021	5
5	Indiana Secretary of State – Assumed Name History	03/12/2021	1
6	(b) (6), (b) (7)(C) Affidavit	05/05/2021	4
7	Class C Exhibitor License – Certificate number 32-C-0265	02/25/2021	4
8	Email – Indiana Board of Animal Health – WILSTEM Premises number	06/07/2021	2
9	(b) (6), (b) (7)(C) Affidavit	04/23/2021	3
10	Animal Care Request for Investigation	02/16/2021	2
11	AnnMarie Compton - Affidavit	04/15/2021	19
12	AC Inspection Report #2016090000440562	09/28/2020	9
13	Letter of Appeal from WILSTEM to AC	10/16/2020	2
14	Diagnostic/Observation Treatment Log Sheet	02/05/2020	2
15	Invoice – Orange County Animal Clinic	02/06/2020	1
16	WILSTEM - Policy and Procedure Infraction Report - Stoll	02/06/2020	2
17	WILSTEM - Policy and Procedure Infraction Report - England	02/06/2020	2
18	WILSTEM - Policy and Procedure Infraction Report - Day	02/06/2020	2
19	Letter of Reply from AC to WILSTEM	12/01/2020	1
20	AC Inspection Report #2016090000496308	02/16/2021	9

21	Email – Animal Care Complaint	08/29/2020	2
22	Email – Animal Care Complaint	09/12/2020	1
23	Email – Animal Care Complaint	09/14/2020	6
24	Email – Animal Care Complaint	09/14/2020	2
25	Photographs of Camel Enclosure with no shade/shelter	09/15/2020	2
26	Amazon.Com Receipt – order number 112-4759498-4032240	09/16/2020	1
27	Tractor Supply Company – Receipt number 370226	09/18/2020	1
28	Wilstem, Inc – General Ledger	01/01/2020-12/31/2020	1
29	Email from (b) (6), (b) (7)(C) to AnnMarie Compton	09/29/2020	1
30	Photograph of Camel Sunshade from (b) (6), (b) (7)(C) to AnnMarie Compton	05/07/2021	1
31	(b) (6), (b) (7)(C) – Affidavit	05/06/2021	5
32	(b) (6), (b) (7)(C) – Affidavit	05/06/2021	3
33	(b) (6), (b) (7)(C) Affidavit	05/06/2021	3
34	(b) (6), (b) (7)(C) Affidavit	05/06/2021	2
35	Photographs of Perimeter Fence and Gaps	09/15/2020	4
36	Photograph of Riprap stockpiled on the veld	05/07/2021	1
37	Cave Quarries, Inc Invoice # 169297	09/26/2020	4
38	Rural King Receipt for Rebar Stakes	09/17/2020	1
39	Spring Valley Supply Invoice # I10360999 for Rebar Pins	09/17/2020	8
40	Amazon.Com Order #111-0736050-0999416	04/26/2021	2
41	Sales Receipts #101 for Night Scope	12/16/2020	1
42	Amazon.Com Order # 112-0385091-2409030	09/11/2020	1
43	Photographs of Broken Wire and deficient fence around Kangaroo enclosure	09/15/2020	2



44	Patient History Report – Kangaroo	05/29/2020	1
45	Patient History Report – Necropsy Results – Perth/Kangaroo	08/10/2020	1
46	(b) (6), (b) (7)(C) – Affidavit	04/23/2021	3
47	Hand drawn map of Wilstem, Inc – Baumgardner	04/22/2021	1
48	ANTECH Diagnostic Lab – Bloodwork Results for Kangaroo	05/30/2020	2
49	Tractor Supply Company – Receipt #369982 – for Kangaroo Fencing	09/16/2020	1
50	Photographs of new Kangaroo Perimeter Fence	05/07/2021	2
51	Photographs of Children Petting/Feeding the Camels – No Attendant	09/15/2020	2
52	Daily Schedule for Wilstem, Inc – No Date	05/07/2021	1
53	Veterinary Plan of Care Sheets	10/12/2020	29
54	(b) (6), (b) (7)(C) – Affidavit	05/05/2021	2
55	Photograph of Tote with Wilstem, Inc USDA Paperwork	05/07/2021	1
56	Program of Veterinary Care Log Sheet – Veterinary Visits	04/15/2021	1
57	Patient History Report – Llama	02/06/2020	1
58	Roel Maldonado – Declaration	06/24/2021	1
59	(b) (6), (b) (7)(C) – Affidavit	05/05/2021	2
60	(b) (6), (b) (7)(C) – Declaration	04/22/2021	4
61	Humane Euthanasia Guidelines Wilstem Wildlife Park	10/12/2020	6
62	(b) (6), (b) (7)(C) Statement Regarding Involvement with Llama and Elands	10/15/2020	1
63	Jeff Watson - Affidavit	05/05/2021	4
64	Hand Drawn Map of Wilstem, Inc – Eland Recapture – (b) (6), (b) (7)(C)	05/06/2021	1

## AFFIDAVIT

I, Jerry J. Fuhs, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 1399 S. Liberty Dr., Bloomington, IN 47403. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

(b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc. (Wilstem), located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is 550 West 36<sup>th</sup> St., Jasper, IN 47546. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C)@wilstem.com. My mailing and residential address is 550 W. 36<sup>th</sup> St. Jasper, IN 47546.

I have owned the property where Wilstem is located for approximately 33 years. I have had a USDA APHIS Class C Exhibitor's license, certificate number 32-C-0265 and customer number 501298 since approximately 2017. I acquired/bred almost all the animals at Wilstem. Some of the hoof stock, and the ring tail lemurs are part of a loaner breeder stock program. The bears belong to Jeff Watson; he is under contract with me to exhibit and keep them at Wilstem. The wolf hybrids belong to (b) (6), (b) (7)(C) she is under contract with me to exhibit and keep them at Wilstem. Elephants are owned by Jorge Barreda who has his own USDA APHIS permits as a contract exhibitor as well.

Wilstem has been registered in the state of Indiana as a domestic for-profit corporation since 2016. I am the director, president, and secretary of Wilstem. My (b) (6), (b) (7)(C) is currently the (b) (6), (b) (7)(C)

Wilstem is an 1,100-acre facility that has animal encounters (domestic, wild, and exotic), zipline tours, and horseback riding. We also offer lodging at cabins located on the premises.

On 16 October 2020, (b) (6), (b) (7)(C) and I wrote to USDA Animal Care (AC) to appeal the Inspection Report (report) dated 28 September 2020, which conducted by AC Inspector AnneMarie Compton on 15 September 2020. This report has an accurate list of animals at the time of the inspection, but we have added more since then. On this report, AC cited Wilstem with the

(b) (6), (b) (7)(C)

SIG

Subscribed and sworn to before me at 4229 US Highway 150, Paoli, IN 47454 this 5th day of May 2021

(b) (6), (b) (7)(C)  
DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





**AFFIDAVIT**

I, Jerry J. Fuhs, being duly sworn on oath make the following statement

following citations: 3.127(a), 3.127(b), 3.127(d), 3.125(a), 2.131(d)(2), 2.75(b)(1), and 2.40(b)(2).

**3.127(a) and 3.127(b)**

(a) had a correction day of 13 October 2020. We corrected this by erecting shade shelters. This was completed on or before October 13, 2020.

We corrected (b) the day of the inspection. The barn was closed that day because Wilstem staff was re-dressing the gravel on the inside of the barn. This situation was corrected by opening the barn doors when the work was finished.

**3.127(d)**

This deficiency had a correction day of 1 November 2020. We corrected this issue on or before November 1, 2020. It is likely that the fence deficiency allowed for a predator to enter the area and kill 2 blackbucks: one found dead on 14 June 2020 and the other found dead on 11 September 2020. I do not know for sure what happened to the animals. I do not recall what the exact cause of death was.

This property has several sink holes and a carst or cave system around and over time some erosion and sink holes created gaps under the perimeter fence. We did eradicate a number of coyotes in and around the property. We have filled all the gaps and sinks holes with rip rap.

Our thoughts were focused on keeping animals in, and there may not have been enough thought given to keeping animals out. Most of the fence was in great shape. There has been some work done with a 'dozer and there may have been some erosion or washing of the soil by rains.

**3.125(a)**

This deficiency had a correction day of 13 October 2020. We corrected this issue on \_\_\_\_\_. The fencing in the kangaroo enclosure was only 5 feet in height and not sturdy. A kangaroo named "Perth" escaped by jumping over the enclosure fencing.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, P

(b) (6), (b) (7)(C)



## AFFIDAVIT

I, Jerry J. Fuhs, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) had been working with this animal and treating for a possible neurological disorder. He had just told us that he was recommending euthanasia. The kangaroo was acting erratic and more or less "flopped" over the fence and out the gate where cars were driving through. The kangaroo was located with in about 6 hours and was darted. He got up and took off. Around 2:00 am we were unable to locate him and decided to suspend the search until daylight. He was found on an adjacent property the next morning. The kangaroo was spotted on the neighbor's property. It had been recommended by the veterinarian to euthanize him due to the illness. At that point we decided to euthanize him by gun shot. I then took him to (b) (6), (b) (7)(C) for necropsy. We replaced the 5 feet fence with 8 feet high fence. We taped the interior wires around the braces.

Staff has permission to call the veterinarian at anytime if one is needed.

2.131(d)(2)

We corrected this deficiency during the inspection. At this time, we did not have a staff at this site because the attendant had come down to take a relief break. He/she probably should have called for a replacement. Another attendant was sent to cover that spot during the inspection.

2.75(b)(1)

This deficiency had a correction day of 14 October 2020. We did not have complete and accurate records because we did not have staff to take care of this. Wilstem, Inc. has since brought in (b) (6), (b) (7)(C) to take care of all the records.

2.40(b)(2)

AC changed this citation to 2.131(b), based on the information (b) (6), (b) (7)(C) and I submitted on behalf of Wilstem.

On 5 February 2020, a llama, that was in with the horses got sick and (b) (6), (b) (7)(C) was called. (b) (6), (b) (7)(C) may have been the person who called the veterinarian. (b) (6), (b) (7)(C) recommended euthanasia. It was upsetting to me that a sick animal was moved before it was euthanized. a former employee (b) (6), (b) (7)(C) current employee (b) (6), (b) (7)(C) former employee

(b) (6), (b) (7)(C)

Subscribed and sworn to before me at 4229 US Highway 150, Pauli, IN 47454 this 5th day of May 2021.

Subscribed and sworn to before me at 4229 US Highway 150, Pauli, IN 47454 this 5th day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.





## AFFIDAVIT

I, Jerry J. Fuhs, being duly sworn on oath make the following statement

loaded into a truck and moved. I had given them instructions to euthanize the animal and bury it. (b) (6), (b) (7)(C) and I talked in the barn. He told me what had occurred with the llama. I called each of them into my office and spoke to them individually. They all 3 told me that the llama was dead before it went into the hole. I was told that it had died while being transported. I wrote statements according to what they told me. All 3 signed statements, dated 6 February 2020, acknowledging that they should have euthanized the llama prior to transport. I suspended (b) (6), (b) (7)(C) for 3 days without pay. I suspended (b) (6), (b) (7)(C) for 5 days without pay. I suspended (b) (6), (b) (7)(C) for 3 days without pay.

On 13 May 2020, 3 elands escaped. The elands were new arrivals and were under quarantine. Their gate latch was not fully closed. They walked out of the long barn and out. (b) (6), (b) (7)(C) was called, and I went to his office to pick up the tranquilizer darts. (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) helped to keep an eye on them while I was at the vet's office. (b) (6), (b) (7)(C) was able to dart one with a tranquilizer. It was transported back to the barn to recover. The other 2 elands were by the hay field. Israel darted one and they both ran into a fenced area. One was darted and went down, the other one amped up and continued to run along the fence row. It broke its neck when it ran into a post inside the enclosure. We have added safety clips to the doors as well.

We do staff that work in specialized areas. Staff that works on the Veld with the hoof stock and staff that works in the "Roo" barn work in those areas every day. They do not move around to different areas.

Around or about July of 2020 we had a guest in the drive through run over an emu. The guest was an older gentleman in a big truck had stopped to look at the other animals. While he was doing this an emu laid down in front of his truck. He started to drive on and ran over the emu's leg. We shut the veld down and the emu was euthanized.

We have never intentionally withheld food or shelter from any of our animals. The staff has permission to call the vet, order feed, or shavings as needed. Other purchases are to be approved by (b) (6), (b) (7)(C) or myself.

(b) (6), (b) (7)(C)

SIC

Subscribed and sworn to before me at 4229 US Highway 150, P

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 18 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615



**AFFIDAVIT**

I, Jerry J. Fuhs, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) is here a minimum of once a month, on call and available by text or cell phone all the time.

We take great pride in our operation. We take care of our animals and work with the veterinarian on a regular basis. We had "lousy" paperwork. We now have (b) (6), (b) (7)(C) to take care of all the paperwork and to manage the staff. She listens to them and is able to manage them effectively.

We have established a morning meeting, and all staff members have radios for easy communication and safety.

I have had an opportunity to read, review, and edit my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, Pa

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 1399 S. Liberty Dr., Bloomington, IN 47403. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc. (Wilstem), located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. The Wilstem Inc. phone number is 812-936-4484. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C)@wilstem.com. My mailing and residential address is (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

My (b) (6), (b) (7)(C) Jerry J. Fuhs, has owned the property where Wilstem is located for approximately 30 years. My background is as a special education teacher for 10 years prior to moving to work for Wilstem, Inc 5 years ago in 2016.

Wilstem has been registered in the state of Indiana as a domestic for-profit corporation since 2016. Wilstem is registered with the address 550 W 36<sup>th</sup> St, Jasper, IN, 47546, the NECS and Fuhs Properties corporate office. The federal tax identification number is (b) (6), (b) (7)(C). Mr. Fuhs is the director, president, and secretary of Wilstem. I am currently the (b) (6), (b) (7)(C) and will soon be the (b) (6), (b) (7)(C). I typically work two to three days a week at the Wilstem, Inc property. I manage another property a few days a week and I am at our corporate office one day a week. I am on call every day. (b) (6), (b) (7)(C) has been the attending veterinarian at Wilstem since the beginning.

Wilstem is an 1,100-acre facility that has animal encounters (domestic, wild, and exotic), zipline tours, and horseback riding. We also offer lodging at cabins located on the premises.

On 16 October 2020, Mr. Fuhs and I wrote to USDA Animal Care (AC) to appeal the Inspection Report (report) dated 28 September 2020, which conducted by AC Inspector AnneMarie Compton on 15 September 2020. I was not present on the day of the inspection. (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, Paoli, IN 47454 this 5th day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) accompanied the inspector during her visit. Jerry Fuhs, (b) (6), (b) (7)(C) and I met with AnnMarie Compton and VMO Rebecca Nanny on September 28, 2020 for the exit interview. This report has an accurate list of animals at the time of the inspection, but we have added more since then. On this report, AC cited Wilstem with the following citations: 3.127(a), 3.127(b), 3.127(d), 3.125(a), 2.131(d)(2), 2.75(b)(1), and 2.40(b)(2).

3.127(a) and 3.127(b)

(a) had a correction day of 13 October 2020. We corrected this on or about, if not before October 13, 2020. Wilstem, Inc built shade structures in the Camel enclosure.

We corrected (b) the day of the inspection. There was a gate that had gone closed which prevented the camels from entering the shelter. A Wilstem, Inc staff member opened it. I am not sure which staff member.

3.127(d)

This deficiency had a correction day of 1 November 2020. We corrected this issue on or about October 13, 2020. It is likely that the fence deficiency allowed for a predator to enter the area and kill 2 blackbucks: one found dead on 14 June 2020 and the other found dead on 11 September 2020.

3.125(a)

This deficiency had a correction day of 13 October 2020. We corrected this issue on September 16, 2020 by tightening the fence and increased the height to 8 feet. The fencing in the kangaroo enclosure was only 5 feet in height and not sturdy. A kangaroo named "Perth" escaped by jumping over the enclosure fencing. On August 10, 2020. He was captured within 24 hours. I do not think "Perth" ever left the property. He was recaptured by being euthanized. (b) (6), (b) (7)(C) had been working with "Perth" prior to the escape. I think he was being treated for possible neurological issues. I believe the veterinarian recommended euthanasia due to his condition.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, Paoli, IN 47454 this 5th day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3616.





**AFFIDAVIT**

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

I will look for records and contact (b) (6), (b) (7)(C) office for their records of treatment as well. I will send them to Inspector (b) (6), (b) (7)(C) by May 10, 2021.

**2.131(d)(2)**

We corrected this deficiency during the inspection. A staff member was sent to attend the camels and visitors. I do not know why we did not have a staff member at this site at the time. We normally had someone scheduled to attend this area. I will try to find the daily sheet with the schedule of attendants and assigned work areas. Visitors were allowed to stop and get out of their cars and buy carrots to feed the camels.

Wilstem has never withheld food from the animals to encourage them to approach the cars to be fed. They are all fed appropriately. We rely heavily on the veterinarian for guidance and advise. We text or call him directly. Staff members have permission to contact (b) (6), (b) (7)(C) as needed. We have instituted monthly visits with him as a preventive measure. He fills out the Program of Veterinary Care Instructions during each visit. The Grizzly Bears and the elephants have their own Plan of Veterinary Care. If he treats any animals, he fills out a treatment log.

**2.75(b)(1)**

This deficiency had a correction day of 14 October 2020. We did not have complete and accurate records because we did not have staff to keep this information updated at that point due to having just come out of a COVID shutdown. This was updated and corrected on or before October 13, 2020. Many of the actual acquisition/ disposition forms were not completed. We had all the receipts, but the forms were not filled out. All births/deaths are accounted for. (b) (6), (b) (7)(C) reports all births/deaths from the "Roo's and Crews" barn and (b) (6), (b) (7)(C) reports that information from the "Vet". I print out the updates each week, if any have taken place.

**2.40(b)(2)**

AC changed this citation to 2.131(b), based on the information Mr. Fuhs and I submitted on behalf of Wilstem.

On 5 February 2020, is prior to my in-depth involvement with Wilstem, Inc. and prior to guest encounters or exhibits of the llamas. I know the employees were not told or given permission to

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, Reelfoot, IN 47454 this 6th day of May, 2021.

(b) (6), (b) (7)(C)



## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

euthanize the llama with blunt force trauma. They had been given permission to euthanize by gunshot. I do not believe the llamas were not part of our USDA permit at that time. They were not being exhibited and guests were only able to see them if they booked a horseback ride. The staff members were all disciplined. I do not know who brought this to Jerry Fuhs' attention.

Wilstem, Inc. now has a euthanasia plan in place that was developed in cooperation with (b) (6), (b) (7)(C). The plan follows the AVMA guidelines.

I believe a former, disgruntled employee had filed a complaint with Animal Care. This same employee also shared staff text messages and facility communications with the AC Inspector. This person was not fired but quit on his/her own because of a disagreement over positions.

I do not have specific details as to what happened. I heard about the incident from Jerry Fuhs. I do know that this was not a directive and all three employees were immediately disciplined.

On 13 May 2020, 3 elands escaped their enclosure. I do know the elands never escaped the property. I was not present for this event. We were instructed to report any future such events.

We have implemented many new policies and practices since September of 2020. We have implemented morning staff meetings, "huddles", daily activity sheets, a facility manual, and new employee orientation. We have also implemented bonuses. I am typically the person employees come to if they have a complaint or question.

We are currently working to update our staff with people who are qualified, knowledgeable, and experienced with exotic animals. "True animal people". We are trying to hire people with at least 2 years of experience. We are looking for people with degrees and experience. Many people are recent college graduates without much experience.

I have had an opportunity to read, review, and edit my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)  
\_\_\_\_\_  
SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4229 US Highway 150, Peoli, IN, 47454 this 5th day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.







United States  
Department of  
Agriculture

Marketing and  
Regulatory  
Programs

Animal and  
Plant Health  
Inspection  
Service

Animal Care

EXPIRATION DATE: APRIL 28, 2021

This is to certify that  
WILSTEM INC

is a licensed CLASS C EXHIBITOR  
under the

## Animal Welfare Act

(7 U.S.C. 2131 et seq.)

Certificate No. 32-C-0265

Customer No. 501298

Deputy Administrator

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average .25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM APPROVED OMB NO.: 0579-0036

No license may be issued unless a completed application has been received (7 U.S.C. 2132-2143), and the applicant is in compliance with the standards and regulations Section 2133.

U.S. DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

# APPLICATION FOR LICENSE (TYPE OR PRINT)

X RENEWAL

DO NOT USE THIS SPACE - OFFICIAL USE ONLY

SEND THE COMPLETED FORM TO:  
USDA APHIS ANIMAL CARE  
EASTERN  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606-5210  
(919) 855-7100

LICENSE NO./CUST NO  
32-C-0265  
501298

RENEWAL DATE  
28-Apr-2019

FEES  
AMOUNT 1855 DATE RECEIVED 4/1/2019

1. NAME(S) OF OWNER(S) AND MAILING ADDRESS  
Wilston Inc  
Po Box 88  
French Lick, IN 47432

COUNTY: Orange TELEPHONE (812) 936-4484

2. ALL BUSINESS NAME, LOCATIONS, AND ALL SITES HOUSING ANIMALS (P. O. Box not acceptable)  
4229 Us Hwy 150 W  
Paoli, IN 47454  
County: Orange  
TELEPHONE (812) 936-4484

3. IF PREVIOUSLY LICENSED - NAME AND ADDRESS

4. NAME AND ADDRESS OF OTHER BUSINESS(ES) HANDLING ANIMALS IN WHICH APPLICANT/LICENSEE HAS AN INTEREST  
N/A

PREVIOUS LICENSE NO.

5. TYPE OF LICENSE  
A - Dealer (Breeder) B - Dealer C - Exhibitor

7. NATURE OF BUSINESS (Check item that describes nature of your business)

☒ A - Zoo ☐ B - Aquariums ☐ C - Auction  
☐ D - Breeder ☐ E - Pets ☐ F - Roadside Zoo  
☐ G - Circus ☐ H - Animal Acts ☐ I - Carnival  
☐ J - Drive thru ☐ K - Pet Store ☐ L - Broker  
Zoo

8. DATE OF LAST BUSINESS YEAR

FROM					TO						
MO	DAY	YEAR	MO	DAY	YEAR	MO	DAY	YEAR			
0	4	2	8	1	7	0	4	2	8	1	8

9. TYPE OF ORGANIZATION  
☒ Partnership ☐ Corporation ☐ Individual  
☐ Other (Specify) \_\_\_\_\_

## 10. LIST OWNERS, PARTNERS, AND OFFICERS

NAME AND TITLE

ADDRESS

Jerry J Fuhs, President  
Wilston, Inc, (Business from Block 1)

550 W. 36th St, Jasper, IN 47546  
4229 W US 150, Paoli, IN 47454

## 10. DEALER ONLY

TOTAL NO. OF ANIMALS PURCHASED IN THE LAST BUSINESS YEAR

TOTAL NO. OF ANIMALS SOLD IN THE LAST BUSINESS YEAR

TOTAL GROSS AMOUNT DERIVED FROM THE SALE OF ANIMALS

DOLLAR AMOUNT OF WHICH FEE IS BASED  
(Sections 2.6 and 2.7)

11. EXHIBITOR ONLY (No. of animals holding now or held during the last business year, whichever is greater)

DOGS	RABBITS
CATS	NONHUMAN PRIMATES 2
GUINEA PIGS	MARINE MAMMALS
HAMSTERS	WILD OR EXOTIC MAMMALS 44
OTHER (i.e., farm animals) (List Species and No.)	TOTAL: 46

## CERTIFICATION

I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and certify to the best of my knowledge I am in compliance with all regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that I am over 18 years of age.

12. SIGNATURE (b) (6), (b) (7)(C)

13. NAME AND TITLE (Type or Print)

JERRY J. FUHS PRES

14. DATE

3/30/2019

APHIS FORM 7003  
(JAN 1995)

(Previous editions are obsolete)

- 4 APR 2019

22-00957\_000072

GOVERNMENT  
EXHIBIT

Page 2 of 4  
APHIS FORM 7070 (MAR 05)



According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM APPROVED OMB NO. 0579-0036

No license may be issued unless a completed application has been received (7 U.S.C. 2132-2143), and the applicant is in compliance with the standards and regulations Section 2133.

U.S. DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

## APPLICATION FOR LICENSE (TYPE OR PRINT)

**X RENEWAL**

DO NOT USE THIS SPACE- OFFICIAL USE ONLY

SEND THE COMPLETED FORM TO:  
USDA APHIS ANIMAL CARE  
EASTERN  
2150 Centre Ave.  
Building B, Mailstop #3W11  
Fort Collins, CO 80526-8117  
(970) 494-7478

3 / 30 / 20 &

LICENSE NO./CUST NO	RENEWAL DATE	AMOUNT	FEES
32-C-0265	28-Apr-2020	235.00	DATE RECEIVED
501298			7 / 10 / 20

1. NAME(S) OF OWNER(S) AND MAILING ADDRESS

Wilstem Inc.  
Po Box 88  
French Lick, IN 47432

2. ALL BUSINESS NAME, LOCATIONS, AND ALL SITES HOUSING ANIMALS (P. O. Box not acceptable)

4229 Us Hwy 150 W  
Paoli, IN 47454  
County: Orange

TELEPHONE ( )

COUNTY: Orange TELEPHONE (812) 936 - 4484

3. IF PREVIOUSLY LICENSED - NAME AND ADDRESS

4. NAME AND ADDRESS OF OTHER BUSINESS(S) HANDLING ANIMALS IN WHICH APPLICANT/LICENSEE HAS AN INTEREST

PREVIOUS LICENSE NO.

5. TYPE OF LICENSE

**A - Dealer (Breeder)** B - Dealer C - Exhibitor

6. DATE OF LAST BUSINESS YEAR

7. NATURE OF BUSINESS (Check item that describes nature of your business)

- ☐ A - Zoo ☐ B - Aquariums ☐ C - Auction  
☐ D - Breeder ☐ E - Pets ☐ F - Roadside Zoo  
☐ G - Circus ☐ H - Animal Acts ☐ I - Carnival  
☐ J - Drive thru Zoo ☐ K - Pet Store ☐ L - Broker

8. TYPE OF ORGANIZATION

Partnership Corporation Individual  
Other (Specify) \_\_\_\_\_

9. LIST OWNERS, PARTNERS, AND OFFICERS

NAME AND TITLE

ADDRESS

Jerry Fuhs - president

10. DEALER ONLY

TOTAL NO. OF ANIMALS PURCHASED IN THE LAST BUSINESS YEAR

TOTAL NO. OF ANIMALS SOLD IN THE LAST BUSINESS YEAR

TOTAL GROSS AMOUNT DERIVED FROM THE SALE OF ANIMALS

DOLLAR AMOUNT OF WHICH FEE IS BASED  
(Sections 2.6 and 2.7)

11. EXHIBITOR ONLY (No. of animals holding now or held during the last business year, whichever is greater)

DOGS	RABBITS
CATS	NONHUMAN PRIMATES
GUINEA PIGS	MARINE MAMMALS
HAMSTERS	WILD OR EXOTIC MAMMALS
OTHER (i.e., farm animals) (List Species and No.)	TOTAL 135

### CERTIFICATION

I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and certify to the best of my knowledge I am in compliance with all regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that I am over 18 years of age.

12. SIGNATURE

13. NAME AND TITLE (Type or Print)

14. DATE

Jerry Fuhs

APHIS FORM 7003  
(JAN 1995)

(Previous editions are obsolete)

22-00957\_000073



According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM APPROVED OMB NO. 0579-0036

No license may be issued unless a completed application has been received (7 U.S.C. 2132-2143) and the applicant is in compliance with the standards and regulations Section 2132.

U.S. DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

# APPLICATION FOR LICENSE (TYPE OR PRINT)

**X RENEWAL**

DO NOT USE THIS SPACE - OFFICIAL USE ONLY

SEND THE COMPLETED FORM TO:  
USDA APHIS ANIMAL CARE  
EASTERN  
2150 Centre Ave  
Building B Mailstop #3W11  
Fort Collins, CO 80526-8117  
(970) 491-7478

LICENSE NO./CUST NO.	RENEWAL DATE	AMOUNT	FEES	DATE RECEIVED
12-1-0765	28-Apr-2020			

2. ALL BUSINESS NAME, LOCATIONS, AND ALL SITES HOUSING ANIMALS (P or Box not acceptable)  
22915 Hwy 151 W.  
Pach, IN 47454  
County: Orange

TELEPHONE | |

1. NAME(S) OF OWNER(S) AND MAILING ADDRESS  
Wildem Inc  
P.O. Box 88  
French Lick, IN 47432

COUNTY: Orange TELEPHONE: (612) 936-4484

3. IF PREVIOUSLY LICENSED - NAME AND ADDRESS

4. NAME AND ADDRESS OF OTHER BUSINESS(S) HANDLING ANIMALS IN WHICH APPLICANT LICENSEE HAS AN INTEREST

PREVIOUS LICENSE NO.

5. TYPE OF LICENSE  
☒ A - Dealer (Breeder) ☐ B - Dealer ☐ C - Exhibitor

7. NATURE OF BUSINESS (Check item that describes nature of your business)

☐ A - Zoo ☐ B - Aquariums ☐ C - Auction  
☐ D - Breeder ☐ E - Pets ☐ F - Roadside Zoo  
☐ G - Circus ☐ H - Animal Acts ☐ I - Carnival  
☐ J - Drive thru ☐ K - Pet Store ☐ L - Broker  
Zoo

6. DATE OF LAST BUSINESS YEAR

FROM			TO		
MO	DAY	YEAR	MO	DAY	YEAR
0	4	2	0	4	2

8. TYPE OF ORGANIZATION

☒ Partnership ☐ Corporation ☐ Individual  
☐ Other (Specify)

9. LIST OWNERS, PARTNERS, AND OFFICERS

NAME AND TITLE

ADDRESS

10. DEALER ONLY

TOTAL NO. OF ANIMALS PURCHASED IN THE LAST BUSINESS YEAR

TOTAL NO. OF ANIMALS SOLD IN THE LAST BUSINESS YEAR

TOTAL GROSS AMOUNT DERIVED FROM THE SALE OF ANIMALS

DOLLAR AMOUNT OF WHICH FEE IS BASED  
(Sections 2.6 and 2.7)

11. EXHIBITOR ONLY: No. of animals housing now or held during the last business year, whichever is greater

DOGS		RABBITS	
CATS		NONHUMAN PRIMATES	
GUINEA PIGS		MARINE MAMMALS	
HAMSTERS		WILD OR EXOTIC MAMMALS	
OTHER (i.e., farm animals) (List Species and No.)		TOTAL	

## CERTIFICATION

I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and certify to the best of my knowledge I am in compliance with all regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that I am over 18 years of age.

12. SIGNATURE

(b) (6), (b) (7)(C)

13. NAME AND TITLE (Type or Print)

Scott J. Fouts

14. DATE

3/24/2020

APHIS FORM 7003  
(JAN 1995)

(Previous editions are obsolete)





(b) (6), (b) (7)(C) APHIS ERCS

**From:** Price, Jennifer <jprice@boah.IN.gov>  
**Sent:** Monday, June 7, 2021 11:35 AM  
**To:** (b) (6), (b) (7)(C) APHIS ERCS  
**Subject:** RE: Premises ID

H (b) (6), (b) (7)(C)

I found more information on Wilstem. Dr. Chavis recognized the name so I did some more searching under accounts instead of premises. Not sure why my search didn't pull this up the first time. There are some phone numbers and an email listed as well if that would be useful.

FUHS, JERRY - WILSTEM WILDLIFE PARK  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
County: ORANGE  
00HX4K1 - Premises ID

WILSTEM WILDLIFE PARK

(b) (6), (b) (7)(C)

PAOLI, IN 47454  
UNITED STATES

WILSTEM, INC DBA WILSTEM WILDLIFE PARK

FUHS, JERRY J

PO BOX 88  
FRENCH LICK, IN 47432  
UNITED STATES  
County: ORANGE

**From:** (b) (6), (b) (7)(C) @usda.gov>  
**Sent:** Monday, June 7, 2021 10:11 AM  
**To:** Price, Jennifer <jprice@boah.IN.gov>  
**Subject:** RE: Premises ID

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Thank you so much!

Hope you had a great weekend!

(b) (6), (b) (7)(C)

**From:** Price, Jennifer <jprice@boah.IN.gov>  
**Sent:** Monday, June 7, 2021 9:04 AM  
**To:** (b) (6), (b) (7)(C) @usda.gov>  
**Subject:** RE: Premises ID

H (b) (6), (b) (7)(C)

I found this entry in our HERDS database but it says federal premises ID not assigned. They are classified as a farm, but listed with a PO box. That is all the information we have on them.

WILSTEM  
P O BX 189



FRENCH LICK, IN 47432  
County: ORANGE  
305-962-5349

**Jennifer Price**

**Compliance Director**

*Scrapie Flock Certification Program Coordinator*

Indiana State Board of Animal Health

Cell phone: (b) (6), (b) (7)(C)

[jprice@boah.in.gov](mailto:jprice@boah.in.gov)

From: (b) (6), (b) (7)(C) <(b) (6), (b) (7)(C)@usda.gov>  
Sent: Friday, June 4, 2021 1:52 PM  
To: Price, Jennifer <[jprice@boah.IN.gov](mailto:jprice@boah.IN.gov)>  
Subject: Premises ID

\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

Hi Jennifer,

Can you tell me if Wilstem, Inc. has a prem id?

Thank you,  
Toni

(b) (6), (b) (7)(C)

Investigator, USDA APHIS ERCS  
Investigative and Enforcement Services  
920 Main Campus Drive  
Raleigh, NC 27606  
Office (b) (6), (b) (7)(C)  
Cell (b) (6), (b) (7)(C)  
Email (b) (6), (b) (7)(C)@usda.gov

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## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 2840 N. St Rd 37, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. Mailing address P.O. Box 88, French Lick, IN 47432. My clinic phone number is 812-723-2553 and my cell number is (b) (6), (b) (7)(C). My email address is (b) (6), (b) (7)(C) @oceanimalclinic.com.

I am a Doctor of Veterinary Medicine and I own the Orange County Animal Clinic located at 2840 N. St. Rd. 37, Paoli, IN 47454. I received my training from Purdue University, in West Lafayette, IN. I have owned this business since 2002 and moved it to its current location in 2009. My National Accreditation Number is (b) (6), (b) (7)(C) and my State of Indiana Veterinary License number is (b) (6), (b) (7)(C). My primary business consists of large animals, dogs, and cats. Treating the animals of Wilstem Inc, has been the extent of my experience with wild and/or exotic animals.

I began treating animals at Wilstem Inc. approximately fifteen years ago when the facility was operating as Wilstem Guest Ranch. At that time, I provided veterinary services for horses and cattle. Over time the owner, Mr. Jerry Fuhs, began to transition the facility from a guest ranch to a wildlife encounter/safari park. I have advised, at various time during veterinary visits, Mr. Fuhs that I am not an expert in wild/exotic animals. In order to treat the animals as needed I consult with veterinarians and exotic animal experts from the University of Illinois, the Louisville, Kentucky Zoo, and (b) (6), (b) (7)(C) an expert on kangaroos at the University of Tennessee. I have not received any formal and informal training in the care or treatment of exotic animals, and I have not provided any training(s) to the Wilstem staff. I feel comfortable with the husbandry aspect of their care, though.

When treatment or capture of a wild/exotic animal is necessary Wilstem staff usually handles this duty. They own the dart gun and the darts needed to deliver the tranquilizer. I have written prescriptions for Wilstem in order for them to purchase tranquilizer from Zoopharm, a veterinary pharmaceutical company. Wilstem will get medication from me if it is needed on short notice.

On or about February 6, 2020 during a farm call to Wilstem I examined and treated a llama with Banamine, and PREDEFER injections for signs of weakness and anorexia. I was informed by Wilstem staff, during a farm call, that the animal's condition had worsened, and I recommended euthanasia at that time. I was not called to perform the euthanasia. I was not aware of how the animal was euthanized until a later time. The treatment sheets presented to me by Investigator (b) (6), (b) (7)(C) were not my treatment sheets and were not in my handwriting. Even though the notes contained are accurate to my farm visit on February 6, 2020, I am concerned that someone completed them without my review or approval. My name is not on these forms, but they are suggestive that they came from me.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIDANT

Subscribed and sworn to before me at 2840 N. St. Rd 37 Paoli, IN 47454 on this 27th day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 5 U.S.C. 2217 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS, AUTHORITY NO 3615



## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

On May 9, 2020 I received a phone call from Wilstem staff that a donkey had a hurt leg. Staff stated that it might be broken. I advised that if it was broken the only option was euthanasia. The next morning, I received a call from Wilstem staff that the donkey was alive and in the pasture with a bone protruding through the skin. The next morning, I went to Wilstem and euthanized the donkey.

On or about May 13, 2020 I received a call from Wilstem needing darts. Three eland escaped their enclosure and needed to be recaptured. I provided the darts that were loaded with tranquilizer to them, but I was not present for this event. Jerry Fuhs was confused on dates and events as I had been at the facility to provide treatment to a zebra within a short time of the eland escape. I signed a statement provided to me by Jerry Fuhs stating that I was not present when the elands were darted. I participated in the creation of this statement. Jerry Fuhs, (b) (6), (b) (7)(C) and I met and discussed the dates and events.

On or about August 8, 2020, "Perth" a male kangaroo escaped his enclosure. Wilstem staff worked to recapture the animal. It was euthanized by gunshot. The kangaroo was presented to me on or about August 10, 2020 when I performed a necropsy. There were no gross lesions and the internal organs appeared normal. The kangaroo had a history of weight loss, anorexia, and signs of restlessness. I observed the kangaroo exhibiting signs of circling to one side.

My relationship with Wilstem and Jerry Fuhs, is strictly professional, and business driven. Wilstem pays for my veterinary services of the animals at Wilstem Inc. Mr. Fuhs has a few personal pets that he has paid for directly for veterinary services. I do not know if any other veterinarians do or have provided treatment for Wilstem.

I have seen a great deal of changes and improvements in the overall conditions, animal husbandry, and record keeping since the September 15, 2020 inspection by USDA APHIS Animal Care. Prior to this inspection the record keeping was limited and the health care and husbandry practices were also limited.

Since the fall of 2020 the fencing has been reinforced and Wilstem has made significant repairs with rock and rebar to prevent predators from traveling under the fence. They have also built multiple shelters for the different species, in order to allow the animals to adjust to changing weather. They have built feeding areas to allow animals to feed in the dry areas and not in the mud. They have built secure stalls in the long animal shed to allow animals to be confined inside, if needed for isolation, treatment, or shelter from inclement weather. The stalls are secured with two separate doors to prevent escape.

There has been a Plan of Veterinary Care in place for a number of years, which has been rigidly followed since the fall of 2020. I walk through the "Roo" barn and examine each species. I also ride through the drive-thru section of the facility with an employee and discuss body condition scores of the different species as well as address any problems that have arrived. I do not know of any pasture animals intentionally not fed with supplemental feed so

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 2840 N. St. Rd 37 Paoli,

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





**AFFIDAVIT**

I, **(b) (6), (b) (7)(C)** being duly sworn on oath make the following statement

that they would approach customers offering them food. I do not recall thin animals to which I did not provide veterinary services. When my veterinary services are requested, I treat the animals as needed and I record the used of medications on Veterinary Care sheets. The plan for further treatment is established and recorded on the care sheet and it is separated and rechecked and/or finalized at the next visit.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

**(b) (6), (b) (7)(C)**

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 2840 N. St. Rd 37 Paoli, IN 47454 on this 22nd day of June, 2021.



**(b) (6), (b) (7)(C)**

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



Animal and Plant  
Health Inspection  
Service

February 16, 2021

Animal Care  
4700 River Road  
Riverdale, MD 20737

**SUBJECT:** Request for Investigation of Alleged Violations  
Regarding the AWA, Regulations and/or Standards

**TO:** Timothy R. Fordahl, Director  
Investigative and Enforcement Services

**FROM:** Elizabeth Theodorson, DVM  
Assistant Deputy Administrator  
Animal Care

**RE:** Potential Violation: 9 C.F.R. parts 2 and/or 3 Section

Individual(s) referring for investigation:

Customer #: 501298  
License/Registration No: 32-C-0265  
Name: Wilstem Inc.  
Address: P.O. Box 88 French Lick, IN 47432  
Location of Incident (if different than address):  
4229 U.S. Highway 150 W Paoli, IN 47454

*Summary:*

Animal Care has reason to believe Wilstem Inc. (WILSTEM) may have violated the Animal Welfare Act due to the serious noncompliances documented on an inspection report, including incidents involving the deaths of multiple animals.

*Background Information:*

From August 29 to September 14, 2020, Animal Care received four anonymous emails (as part of complaint AC20-467) regarding alleged animal welfare violations at WILSTEM. The emails included names of staff members involved, or witness to, alleged instances of negligence and mishandling that resulted in the deaths of several animals.

On September 15, 2020, AnnMarie Compton (COMPTON), an inspector with Animal Care, conducted a routine inspection at WILSTEM. COMPTON cited critical noncompliances for the following incidents:

- A staff member transported a live llama in an inappropriate manner after being directed to euthanize the animal by gunshot.
- An eland broke its neck during an unsuccessful capture attempt.
- Loose perimeter fencing allowed dogs or coyotes to enter a multi-species grazing area. Two blackbuck were found dead by staff in the grazing area due to an apparent predator attack.





*Scope and concerns:*

Animal Care has serious concerns regarding allegations made against Wilstem in the attached complaint. COMPTON authored several emails and a memo after the inspection which appear to show employees at the facility may have provided or been encouraged to provide false statements regarding the circumstances of the incidents.

Animal Care requests IES investigate the critical noncompliances documented on the inspection report and interview witnesses listed in the complaint in order to determine if the documented noncompliances, or any other critical incidents can be substantiated. In addition, Animal Care is interested in any evidence that substantiates false or fraudulent statements made by staff members to any government official.

If unrelated but additional information is discovered during this investigation that could substantiate a noncompliance with the AWA and its Regulations, notify the program point of contact to discuss next appropriate steps.

*Prior Enforcement History:*

No prior history

Attached is all relevant evidence that Animal Care collected in connection with the violation, specifically:

- Inspection reports and photos
- Anonymous complaint (AC20-467)
- License application and certificate
- Memo and emails from COMPTON related to WILSTEM

Supervisory Animal Care Specialist  
Susan Kingston (217) 379-2593  
[susan.k.kingston@usda.gov](mailto:susan.k.kingston@usda.gov)

Animal Care Inspector  
AnnMarie Compton (618) 315-3649  
[Annmarie.Compton@usda.gov](mailto:Annmarie.Compton@usda.gov)

Please notify our staff at [ac.rss.mailbox@aphis.usda.gov](mailto:ac.rss.mailbox@aphis.usda.gov) of the case number as soon as it is assigned. If you have any questions about this request, please contact Jeremy Steele at (740) 417-1296 or [jeremy.t.steele@usda.gov](mailto:jeremy.t.steele@usda.gov).



## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150. Paoli, IN 47454. Mailing address P.O. Box 88, French Lick, IN 47432.

I work as an Inspector for USDA APHIS Animal Care. I have worked in this position for 11 years. As an Animal Care Inspector, I conduct routine, unannounced inspections of all entities that hold a USDA License/registration under the Animal Welfare Act. This includes any breeder, broker, exhibitor, transporter, or handler of any mammals including the inspections of dog breeding facilities and exhibitors of exotic /dangerous animals.

During the week of September 14, 2020, I received 4 complaints from 2-3 anonymous sources concerning Wilstem Ranch (32-C-0265, French Lick, IN). They wished to remain anonymous because they stated they were current employees or had recently been fired.

On September 15, 2020, I conducted a complete inspection and inquiry on these complaints with (b) (6), (b) (7)(C). The owner, Mr. Fuhs was out of town. The inspection report documented 5 regular NCIs and 2 critical NCIs. The discussions with the various complainants and some staff members revealed what appears to be a very hostile work environment. The employees are texted frequently by the (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) to keep quiet about any incidents that happen at the facility where animals die or have been injured, with the threat of trouble if they speak out. There have been texts that have been sent attached to the complaint. The complainants advise that when they report problems with the animals or concerns on their care, they are ignored or warned to leave it alone, while nothing gets done. Several employees have been recently fired or left due to personnel issues with the management and concerns about the care of the animals.

After this inspection I was advised by other staff that (b) (6), (b) (7)(C) and Mr. Fuhs

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT



Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.



## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

were going through the staff questioning them daily trying to figure out who made the complaints to the USDA, causing concern and stress at the facility. Mr. Fuhs stated *to me* that he thinks that several employees that have been fired recently are responsible for the complaints and that they are just trying to make the facility look bad for retaliation.

On September 17, 2020 I spoke with (b) (6), (b) (7)(C) of Orange County Animal Clinic, LLC, Wilstem's attending veterinarian, via phone and asked him about each of the complaints concerns over the animal deaths. He responded to each inquiry after reviewing his records and advised that he was not present during any of the facilities darting incidents including the llama, emu, eland, two aoudads, and kangaroo. He stated that he only knew about the facility coming to get darts from him for an escaped eland, and advised he was never consulted about the incident. He knew about one dart for an aoudad with an eye that needed treatment, however he was not told about the resulting death when the animal was located the next morning -the death is undetermined if it was due to immobilization complications or something else. The rest of the reported incidents that the facility members, (b) (6), (b) (7)(C) and Mr. Fuhs advise the veterinarian was present for or consulted on were not true according to (b) (6), (b) (7)(C) records or memory.

**Discussion of animal incidents/veterinary involvement at the exit interview**

On September 23, 2020 the exit interview was conducted with Dr. Kerry McHenry, AC VMO, (b) (6), (b) (7)(C) Mr. Fuhs, his (b) (6), (b) (7)(C) at the facility. (b) (6), (b) (7)(C) was not included in the exit interview because Mr. Fuhs stated that she was not going to be the (b) (6), (b) (7)(C) any longer but would return working with the birds.

As stated above (b) (6), (b) (7)(C) told me that he was not consulted/unaware of the incidents and deaths of the eland, two aoudads, the kangaroo, the llama, and the emu. At the inspection (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) was present and/or aware of the darting incidents and deaths. At the exit interview, Mr. Fuhs again reiterated his employees' statement, but (b) (6), (b) (7)(C) denied it. (b) (6), (b) (7)(C) said he had been told of one death of a fallow deer, but nothing about the other two blackbucks. He also knew that Wilstem employees (unknown who) got tranquilizer darts for the eland and one aoudad. (b) (6), (b) (7)(C) stated he was not consulted on

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

recapturing the escaped eland or kangaroo. He did say he knew there was an aoudad that was going to be tranquilized and talked about for an eye issue but was never informed that the animal died the next day after the facility darted it. (b) (6), (b) (7)(C) stated he was only called to euthanize a donkey that was in severe pain, and since he could not make it immediately, he advised that they needed to euthanize via gunshot immediately. He did not realize that the facility waited until the following day to kill the donkey, allowing it to suffer for that period of time. Mr. Fuhs continued to state that (b) (6), (b) (7)(C) just didn't remember all the incidents because he was so busy.

The lack of timely veterinary care and proper guidance in animal health situations caused unnecessary pain, discomfort, and death of the regulated animals. At this facility the lack of veterinary guidance and authority (as demonstrated by their lack of direct/frequent communication with him and lack of following his directions) has led to several deaths and euthanasia's that resulted in unnecessary and prolonged pain and discomfort to the animals. The methods of euthanasia for the llama and an emu were not an approved method according to the attending veterinarian.

The facility also failed to report all nine incidents of animal deaths and escapes to their inspector and initially omitted them during the inspection when asked directly. They continued to be untruthful about the details of the incidents after they were confronted with the complainants' statements and given a second chance to tell the truth during the inspection. While they did finally admit to each of the incidents as having happened, they continued to say the veterinarian was aware and involved, and left out other incidents that were reported to me by the attending vet (3<sup>rd</sup> veld death of a fallow deer in the beginning of September) and the loss of a blind aoudad baby per complainants' statements.

**1-Llama Incident.** The most egregious critical NCI occurred on February 5, 2020 when a sick llama was "euthanized" by an employee (b) (6), (b) (7)(C) using the bucket of a mini excavator. At the inspection, I interviewed two employees (b) (6), (b) (7)(C) who were present at the incident. They stated the live animal was scooped up into the excavator bucket, dropped into a hole, and then the bucket was used to crush the animal's skull. According to them, Mr. Fuhs had instructed (b) (6), (b) (7)(C) to shoot the llama, but (b) (6), (b) (7)(C) chose to use the excavator (b) (6), (b) (7)(C) did not watch the crushing,

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





## AFFIDAVIT

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but [REDACTED] stayed to observe it [REDACTED] stated that he was sorry he didn't do enough to stop the incident and said he now suffers anxiety and stress over what he witnessed. Furthermore, during the inspection [REDACTED] (b) (6), (b) (7)(C) said they had gotten into trouble when Mr. Fuhs learned of the incident. He punished them by making them work without pay for a few days, and [REDACTED] eventually left the facility in March. According to them and complainants' statements, Mr. Fuhs told everyone to never speak of the incident again, or they would be fired. Mr. Fuhs had not been present at the inspection, and employees were able to speak freely.

However, at the exit interview, Mr. Fuhs told me that he and his lawyers would be appealing the inspection report. After the inspection and prior to the exit interview, Mr. Fuhs stated that he had [REDACTED] (b) (6), (b) (7)(C) write out statements saying they didn't know if the llama was dead or alive when it was placed in the hole. I asked Mr. Fuhs why their statements had changed because they had been adamant at the inspection that the animal was still alive. He did not have an answer but stated it would be part of the appeal. Both witnesses had appeared very distressed about the incident when we discussed it during the inspection. Both boys were nervous, wringing their hands and tearing up. Their confession of the incident appeared honest and caused obvious guilt and discomfort. However, I believe that Mr. Fuhs exerted pressure on them, with the possibility of being terminated, to get them to write these statements according to informant information.

The attending veterinarian told me he would never approve this method euthanasia and was very upset about this incident.

Notes from my Wilster call log that I started keeping due to multiple changing stories:

On 10-15-2020 [REDACTED] (b) (6), (b) (7)(C) called me after a meeting with Mr. Fuhs. He stated that Mr. Fuhs confronted him about the eland and llama incident, telling the vet that he (Mr. Fuhs) felt the vet was aware of the llama and eland treatments. However, [REDACTED] (b) (6), (b) (7)(C) stated he told Mr. Fuhs he was not aware of how they killed the llama or eland darting incident because he was not there. Mr. Fuhs told the vet that he was there for the zebra and that darting incident was in the same area as the eland incident, and that is why he (Mr. Fuhs) had confused the animal time frames of when the vet was there. [REDACTED] (b) (6), (b) (7)(C) stated he was

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me a [REDACTED] (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
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AUTHORITY NO 3615.



## AFFIDAVIT

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*asked to sign a statement that Mr. Fuhs wrote up for him about the confusion of the eland and zebra incidents and that said the vet was consulted on both.*

**(b) (6), (b) (7)(C)** *called immediately after to advise me that he just signed the one document that said he was present for the zebra but not the eland incident, because that was true. He wanted me to know that he was not changing his story about what he was involved with but wanted me to know that Mr. Fuhs was actively trying to document things in his own wording for the vet to sign. I advised the vet to keep copies of whatever he signs, and to be careful if it is not something, he wrote up himself, as the narrative could be changed later with his signature on it. It looks like Mr. Fuhs is trying to get signed documents from his employees and the veterinarian that will support whichever narrative he is trying to go with for his appeal.*

**(b) (6), (b) (7)(C)** *stated that Mr. Fuhs said, 'there was no problem with the way the llama died, it was that Wilsterm did not let the veterinarian know they were putting it down'. Therefore, I think Mr. Fuhs is trying to get signed statements showing that the vet did know the animal was sick and would have to be put down because of **past** conversations and treatment issues with this animal and others like it that were put down in the past. And, that this would show he was communicating with his veterinarian, even though he had not communicated about this animal at the time the decision was made to put it down and the method used.*

*The story has changed 3 times. The facts are the vet was not involved with the eland incident during the darting, and he did not know about the llama being put down that day by method of excavator.*

- Please see call log memo for additional information.

At the exit Mr. Fuhs admitted during the interview that the crushing of the skull of the llama happened and that it was not ok, and that he dealt with it, he admitted that it happened 'and wanted to put their heads through a hole in the wall over it' that he was that upset (1<sup>st</sup> story). However, in the same breath he stated he had the boy's wright up statements because now they thought the animal may have already died before the excavator crushed the skull (2<sup>nd</sup> story). Mr. Fuhs did not show such statements and said he would enter them in the appeal. On October 13, 2020 Mr. Fuhs stated during a conference call he came across statements all three boys 'made on

**(b) (6), (b) (7)(C)**

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at **(b) (6), (b) (7)(C)** on this 15<sup>th</sup> day of April 2021.

**(b) (6), (b) (7)(C)**

DESIGNATED PURSUANT TO 18 U.S.C. 2217 TO  
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AUTHORITY NO 3615.





## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

their own on Feb 6, 2020\*, the 3<sup>rd</sup> version of events where the animal died while being transported by truck to the burial site, the excavator was removed completely.

After looking at the statements after the appeal decision it was obvious the statements appeared to be written by someone else, as the handwriting and wording of the statements appear the same/similar, and the boys' signatures were completely different than the statement writing. These statements appear to be written after the fact to cover up the severity of the actual details of the incident. The 3<sup>rd</sup> story in the appeal reported that the llama died while being transported in a truck to the site it was to be euthanized. This version removed the excavator all together. I was advised by an informant that Mr. Fuhs had stated that he was going to get the USDA to drop the charges and change it by the time he got done entering his paperwork. According to the informant, their contact stated, that Mr. Fuhs said that he had it all worked out and would get the 'excavator' taken out of the writeup because that would make Wilstem look really bad. The informants were very concerned that the facility was going to get away with everything because he had money and lawyers.

After the appeal decision on 12/1/2020 of this incident I was shown the paperwork that was turned in by Mr. Fuhs as evidence stating that the llama had not been killed using the excavator. Submitted as evidence were 'health records' that showed the daily checking of the animal and notes of contact with the veterinarian and the decision to put it down.

- It should be noted that during the inspection there were no records of any kind for this incident, they stated they did not know they should keep any.
- The health records they produced the appeal board was on a form that I sent the facility **after** the inspection on 9-29-20 as an example of one they could use in the future to document health issues.
- The records produced to the appeal board were generated after the inspection and turned in as evidence that they say they kept during the incident.

The AC Appeal board decided to remove the original NCI from under the lack of veterinary care/communication 2.40(b)(2) to 2.131(b) due to the method in which a sick or injured animal

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
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AUTHORITY NO 3615.



## AFFIDAVIT

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was loaded and transported to the burial location prior to euthanasia. This section requires that handling of all animals be done as expeditiously and carefully as possible in a manner that does not cause trauma, stress, physical harm, or unnecessary discomfort to the animal. If the animal was taken to the burial site in a truck and died on the way, it would have caused trauma, stress, and unnecessary discomfort to the llama. The 'newly' found and signed documentation that was submitted by the facility for the appeal changed the report from a vet care NCI-(when the llama was killed by excavator) to a handling NCI (llama died during transport by truck).

**-Donkey Incident.** On April 4, 2020, a donkey in the pasture was discovered by the farrier to have a broken lower leg for an unknown period of time (b) (6), (b) (7)(C) was contacted by a facility employee and he stated that the animal should be euthanized by gunshot immediately by the facility, since he could not get to the facility quickly to stop the animal's suffering. While the direction was given to immediately euthanize the animal, the staff member (b) (6), (b) (7)(C) that was approved to shoot the donkey did not euthanize it that day. An employee (b) (6), (b) (7)(C) was the (b) (6), (b) (7)(C) at the time and was unable to get any assistance from the facility to put this animal down while it was suffering. She stated she went to (b) (6), (b) (7)(C) that night to get Bute for the pain to help with the pain overnight until the facility could put him down in the morning. The following day, she was still unable to get (b) (6), (b) (7)(C) or anyone to assist with putting the animal down and called the veterinarian again. The donkey was still alive for the second day with the condition having gotten much worse with the leg bone protruding through the skin.

The attending veterinarian was able to immediately euthanize the donkey on day two after discovery of the injury. However, due to the facility not acting on the veterinarian's instructions the previous day, the donkey suffered for an extended time. When contacted by the USDA, the attending veterinarian advised he was unaware that the animal had not been put down the day before as he had instructed, until he was directly contacted the second day by (b) (6), (b) (7)(C). Since this was an equid, this was not cited in the report. However, it is more evidence that (b) (6), (b) (7)(C) is not being communicated with and his directions are not being followed. It also shows again that animal welfare is not being considered at this facility.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3645.





## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) told me that Mr. Fuhs prefers the animals to be put down in the least expensive way (gunshot) and that she frequently had problems with being able to get things done for the animals in a timely manner. The attending veterinarian advised he was aware Mr. Fuhs would rather use less expensive measures when possible and has had discussions about preferred methods of euthanasia and gunshot is only to be used as last resort/emergency circumstances.

(b) (6), (b) (7)(C) was replaced by (b) (6), (b) (7)(C) in May 2020 as (b) (6), (b) (7)(C) and she was placed in the office to work away from the animals. The day after the inspection, (b) (6), (b) (7)(C) reported she was forbidden to work in the office or have contact with computers/records or animals. She advised she felt they thought she was responsible for the complaints and was being punished by not being allowed to do her job. She advised that she quit within the week and took a job elsewhere before letting them fire her. She advised one of the other employees that was also fired due to being accused of being a complainant also took a new job.

**3-Emu Incident.** On July 16, 2020, an emu was run over by a member of the public while driving through the veld portion of the facility on opening day. The emu was still alive with its severed lower leg lying in the roadway. Employees were able to restrain the injured animal while the public was moved away. (b) (6), (b) (7)(C) arrived with a gun to dispatch the animal, and after two shots, one to the head and neck area, the bird died.

The attending veterinarian had not been contacted or consulted and was unaware of the incident. He told me he would have used euthanasia solution as a method of euthanasia and would not have approved gun shot as the method. Mr. Fuhs stated during the exit that they needed to shoot the animal immediately to limit the suffering of the animal versus waiting for the veterinarian. The attending veterinarian has spoken to the facility about how and when to euthanize animals via gunshot. (b) (6), (b) (7)(C) stated that he does not prefer that method, but he does support it when it is an emergency and under his approval. He was never made aware of this incident.

There seems to be a serious disconnect between the facility and their attending veterinarian. The facility appears to find animals with health issues and fails to consult their vet before treatment or fails to follow up with reporting the results to the vet after a death of an animal after their own

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
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AUTHORITY NO 3615.



## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement  
self-treatment has been provided.

**4-First Aoudad Incident.** On June 6, 2020, an aoudad was darted and treated for an eye issue. The employee advised the attending veterinarian was present during the darting and treatment of the animal. They advised that the next morning the animal was found dead possibly due to a reaction to the immobilization. The attending veterinarian advised that the facility did pick up the drugs for the tranquilization, however he was not there during any darting or treatment of the animal (contrary to what the facility employee stated) and furthermore, had not been informed that the animal died. The death of an animal after an immobilization could be due to improper dosage or lack of sufficient monitoring during recovery. The facility employees (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) stated the animal was watched in the pasture until it stood up and was then left there overnight.

The lack of experience and knowledge about chemical immobilization and animal behaviors and symptoms of medical issues could have attributed to the death of this animal if symptoms were not identified properly. The Attending Veterinarian is not being communicated with, nor given proper authority.

**5-Second Aoudad Incident.** At the time of the inspection, I noted a second aoudad with hair missing over the back portion of the back and back legs. The employees stated that the attending veterinarian had been involved in the darting and treatment of the animal, and they were continuing to treat her. The attending veterinarian advised he did look at the animal from a distance when he was there treating an ear injury on another animal. He stated that he told the facility it should be darted and examined and possibly a skin scraping taken by him to determine the issue. However, the facility never contacted the attending veterinarian when they darted and treated her, and he was never contacted about treatment options.

The animal was sold by the facility before the exit interview. This was not cited because it did not appear to be causing pain or discomfort. (b) (6), (b) (7)(C) was aware of the animal, and the facility was treating it. Also, the stories changed over time, and (b) (6), (b) (7)(C) did remember having a vague discussion about if it was darted, he would want skin scrapings or samples to determine treatment. However, it is another example of the facility not following their Attending

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIAN

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
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## AFFIDAVIT

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Veterinarian's guidelines for identifying a health issue or informing him of the treatment they provided. The attending veterinarian stated he has no record of the facility getting any darting drugs or treatments from him for this animal.

**6-Kangaroo Incident.** On August 8, 2020, a male kangaroo 'Perth' escaped by jumping over the primary enclosure fence (5ft high) during a public feeding exhibition and left out the front gate of the facility. (b) (6), (b) (7)(C) told me he received guidance and the darting medications from (b) (6), (b) (7)(C) while he was at the clinic. The kangaroo was located and darted near a neighbor, but it disappeared, and they were unable to find it. The next day the kangaroo was located and darted again, captured, and taken to their veterinarian. A few months prior to the escape, the kangaroo had been acting agitated and showing neurological symptoms, according to (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) had run multiple tests and felt the animal may have cancer and should be euthanized. The employee stated that he brought the animal alive to their attending veterinarian after being darted, and that the animal was euthanized at the clinic.

(b) (6), (b) (7)(C) told me that there were no tranquilizer drugs picked up by the facility to dart the kangaroo. He was told the animal had escaped the day before, and when it was located, they shot it. The kangaroo was brought to the veterinarian already dead from a gunshot wound.

During the exit interview (b) (6), (b) (7)(C) who stated the animal was darted twice and brought to the veterinarian alive changed his story for the 3<sup>rd</sup> time, and in front of his employer Mr. Fuhs. Both Mr. Fuhs and (b) (6), (b) (7)(C) stated that the kangaroo was only darted once after the escape, when they lost him over night. The next day they advised they found the animal off their property and that due to the animal not acting right and near a public road, they felt they should shoot the animal instead of darting him. Mr. Fuhs stated that they were planning to euthanize the animal after the public exhibition on the day of the escape, and had discussed it again with the Attending Veterinarian, however the kangaroo escaped before it could be put down. They felt the gunshot would be safer for the public and more humane for the animal than darting him again.

(b) (6), (b) (7)(C) stated they had talked about euthanizing the animal a day or two before he escaped. He also stated that they did not collect darting drugs from him for this escape, however he thinks they may have had some left over from recent previous examinations on the kangaroo.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
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AUTHORITY NO 3615



## AFFIDAVIT

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I asked (b) (6), (b) (7)(C) why he lied to me again about the details of the incident. I asked if he just told me he darted it and took it to the vet alive for him to put it down so that it didn't "look bad". At this time (b) (6), (b) (7)(C) nodded yes and mumbled, 'yeah'. It should be noted that local law enforcement was involved according to the complainants.

**7-Eland incident.** On May 13, 2020, three elands escaped from their pasture and were loose on the grounds of the facility. (b) (6), (b) (7)(C) stated that he received the drugs for the tranquilizer darts from (b) (6), (b) (7)(C) and that he was present during the darting to recapture the eland. (b) (6), (b) (7)(C) stated the veterinarian was telling him what to do during the darting. The first eland was darted and taken to the barn, the 2<sup>nd</sup> eland (M) was darted and ran into a fenced pasture, closely followed by the 3<sup>rd</sup> female. At this time, the elands were back in containment, but (b) (6), (b) (7)(C) stated that the female was running into the fence, panicking and he decided to try to dart her to prevent her from hurting herself. The dart missed the eland, but the shot spooked her, and she immediately ran into a fence post, breaking her neck.

(b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) had instructed him to try and dart the panicking eland. However (b) (6), (b) (7)(C) said he was not there and was only aware that the facility had an escaped eland when they came to the clinic to pick up the tranquilizer drugs in the late afternoon. The veterinarian was not advised about the darting incident and stated he would not have approved darting a panicked animal that was already contained in the pasture. There was no consultation with the attending veterinarian during the incident.

During the exit interview Mr. Fuhs and (b) (6), (b) (7)(C) continued to state that the attending veterinarian was present during the darting and told them to dart the eland while it was panicking. They provided a name of a staff members (b) (6), (b) (7)(C) that would corroborate their version of the story, however the employees questioned stated that the veterinarian was not present on that day. I checked again with (b) (6), (b) (7)(C) and he was adamant that he was not there as he was on other business, and that he was never involved or consulted.

The Attending Veterinarian stated he could not understand why the facility would lie about his

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 28 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615





## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

presence, as he said at no time would he or anyone with knowledge of darting animals try to do so when the animal was already safely contained in a fenced area and was running in panic. He advised that he would have had people move away and let the animal calm down.

This entire scenario is more evidence of the lack of knowledge of proper chemical immobilization, situational awareness, and basic common sense in this kind of situation which lead to the needless death of an animal already contained in a fenced area. It also further demonstrates the lack of authority of the Attending Veterinarian.

Per my call notes on 10-15-2020 (b) (6), (b) (7)(C) called to advise me that Mr. Fuhs told the vet that he was there for the zebra darting, and that the zebra darting incident was in the same area as the eland incident, and that is why he (Mr. Fuhs) had confused the animal time frames of when the vet was there. (b) (6), (b) (7)(C) stated he was asked to sign a statement for the appeal board that Mr. Fuhs wrote up for him about the confusion of the eland and zebra incidents and that the vet was consulted.

**8 and 9 Blackbuck Incident.** - Two blackbucks were killed in the 'veld' (pasture) area of the facility due to holes in the perimeter fence allowing a predator to enter the enclosure. The Attending Veterinarian was able to advise me of a third fallow deer that was killed in the beginning of September (b) (6), (b) (7)(C) stated that (b) (6), (b) (7)(C) texted him a photo of a carcass of the animal from the day before and asked his thoughts of what could have killed it. They felt coyotes were entering the veld killing the stock. The Attending Veterinarian stated he was not aware of the two other deaths that had occurred on June 14 or September 11<sup>th</sup>. The facility staff on the inspection did not mention the third animal death when I asked for confirmation on the number of animals found dead.

I asked (b) (6), (b) (7)(C) if they had located where the coyotes were coming in, or if they had done anything to the perimeter fence to try and stop the losses, and they advised they

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me a (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
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AUTHORITY NO 3615.



## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

had not. They stated they were talking about maybe getting a guard dog for the veld area.

**Concerns on Handling**

-There are several concerns with this facility and how they are running public encounters with the kangaroos and sloth. At the time of the inspection, (b) (6), (b) (7)(C) told me the facility was running encounters with the sloth 2 times per day, with 5-10 people, 7 days a week. The groups go inside its primary enclosure to feed it carrots and to pet it. A complainant advised a previous staffer (b) (6), (b) (7)(C) got into trouble for not allowing people to touch the animal when it was showing signs of agitation. He was recently fired by Mr. Fuhs during the summer. A complainant had issues with the numbers of people that were allowed into the enclosure and how often it was being done, because the sloth did not appear to be adapting well with the interactions. The complainant also advised the public interactions were averaging 3 times per day with 1-15 people at 0930, 1-12 at 1630 and that if there are people that are willing to pay for an encounter they will do more than the 3 times per day, 7 days a week. I did not see any public interactions at the time of the inspection.

-The kangaroo interactions allow up to 10 people through their primary enclosure in the barn out into the fenced (5ft high) area just outside the barn door approximately 30x20ft in size. There is one keeper with up to 10 people, where they are allowed to go up to the animals and pet them in this area. (b) (6), (b) (7)(C) stated that the public is only allowed to go a quarter of the way down the top part of the pasture area so that the kangaroos can hop to the far end to get away from people. Currently there are 2 females with joeys in pouch and a fully intact male (Brisbon-3yr). The second male Perth was present until his escape/euthanasia the previous month. The complaint mentioned the remaining male (Brisbon) started showing strange behavior recently and was still being put through public exhibition per instructions from (b) (6), (b) (7)(C). When asked about this (b) (6), (b) (7)(C) stated they have spoken to the vet and were keeping an eye on him. She said they let him rest a day and resumed the visits the following day. He appeared fine, in her opinion.

The complainants and some staff advised that Mr. Fuhs is very adamant that there are as many showings and public encounters as possible in order to bring in the funds. They advised they have seen the public petting the kangaroos through the fence on the outside with no keepers'

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615





## AFFIDAVIT

I, AnnMarie Compton, being duly sworn on oath make the following statement

present, and that they have seen the public go further into the primary enclosure than the quarter distance described.

Options were discussed that could offer a safer environment for the breeding population of kangaroos to be in a separate area, and other ideas to allow for careful and monitored interactions with the kangaroos and sloth, including limiting the times and days of public contact. At the time of the inspection the facility was open 7 days a week from 8am-5pm. The staff advised they would consider some of the options for a safer encounter and time for the animals. I advised them to discuss this further with (b) (6), (b) (7)(C)

- I received a call with information from a complainant that two days after the exit interview, September 26, 2020, that the facility had increased kangaroo encounters to include timeframes from 530pm to 8pm, 7 days a week. The public are still allowed into the enclosure with all the females, joeys and intact male. It appears the facility is not taking AC concerns about animal handling seriously, as they have increased their public contact by 2.5hrs a day with more people. There were a reported 300 cars that went through the drive through and Roo area on Saturday September 26, 2020. This is something that could be confirmed at a later date.

- The additional concerns of the complainant and other staff members is the lack of employees during this time. They have only 2 employees to run the encounters and feed 10 or more bottle babies in the Roo barn. The complainant advised they do not have time to do encounters and feed all the bottle babies in time, and the animals are suffering for it

-During this same call I was advised that the facility put up feeding tubes with leaves for enrichment due to the discussion of the giraffes continuous licking of the walls (observed during the inspection). However, according to the complainants, the enrichment was removed the day after the exit briefing. The staff member asked why they were removed, and they were told they didn't have time to maintain them, and they are currently in the back room. The licking of the walls will continue without any other enrichment available; this was a problem we discussed at length with possible solutions to decrease or prevent this behavior. There is no reason to stop

(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

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enrichment that could lessen the stress or discomfort of an animal that needs to perform its basic natural movements and behaviors and is showing signs of that stress.

Update: At the Jan 26, 2021 inspection the giraffes still did not have the tubes w/leaves or any enrichment to stop the licking behaviors. I was advised they were in the back room. Concerns about the lack of keeping up with all the animals needs and enrichment options continue.

**Concerns on the decision making for animal care at the facility**

-Currently the public can buy a cup of 3-4 carrot sticks to feed the camels, giraffe, or other animals at the facility. There is not an acceptable measure of how much regular food is to be fed in addition to the carrots fed by the public.

At the inspection, I asked (b) (6), (b) (7)(C) how she determines the proper amount of feed for the camels or giraffe when they are being fed by the public in conjunction with their regular feed. Her response was 'if the animal looked distended or their abdomen was rounded' she would stop the public feeding. This is not an acceptable way to measure the daily food consumption with public feeding.

By the time the abdomen is that noticeable, it could be too late to stop the discomfort from overeating. If the Animal Director is not on site to make that decision, or does not see the overeating in time, this could cause a possible health issue or discomfort for the animal. This is another example of lack of knowledge or experience with the animals at the facility.

-The facility has a **parakeet encounter** where the public can feed parakeets with birdseed on a stick. Within the past 1-1.5yrs the complainants stated that Mr. Fuhs used gorilla glue to hold the birdseed to the sticks, which resulted in multiple bird deaths daily. The situation was resolved after the Gorilla Glue company was contacted by a staff person who advised this glue was not for consumption. Also, a recent incident occurred when (b) (6), (b) (7)(C) went to break the neck of a sick parakeet and pulled the head completely off.

Update: after this exit interview I was advised by an informant that the young man that saw the

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(b) (6), (b) (7)(C)

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head being pulled off the bird was fired/or forced to leave because they believed he was one of the complainants. He was not.

-There are multiple complaints from staff that the **animals were turned out onto the veld area over the winter of 2020 without enough daily food and water**. They advised that Mr. Fuhs told them he wanted the animals to come to the fence when the public came in the spring, and to just bring food up there to draw them to the fence, but to keep them hungry. Complainants advised that when they had duties with the veld, they would feed and water multiple times a day to make up for them not getting enough food and water.

The attending veterinarian advised he had noticed several llamas and alpacas that had looked rough on his visits for other animals, but assumed they were new arrivals or could have parasite issues that he had been trying to get under control previously. He stated he was not aware Mr. Fuhs was just turning them out on only pasture during the winter without adequate food, and that he would talk to him about proper winter diets and pay more attention to the facility animals over the winter.

Lack of experience and knowledge is causing potential discomfort, health issues and deaths. There have been multiple deaths of alpacas and llamas due to poor health and dehydration according to the statements by the staff at the inspection, complainant's, and veterinary comments.

**Concerns with transporting, number of employees and lack of training**

A complainant mentioned (b) (6), (b) (7)(C) was transporting animals inappropriately using her small car after she was observed **transporting a mini donkey in a dog crate**. The complainant *Enrique* advised the animal was dragged out by its feet while lying on its side, because it was too ~~small~~ *and* to fit in the crate.

This incident is another example of lack of knowledge or basic consideration of animal welfare and care at this facility, and the lack of experience of their Animal Director.

(b) (6), (b) (7)(C)

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Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
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**-The lack of experienced and trained employees** was discussed during the exit briefing with Mr. Fuhs. There are approximately 10-12 fulltime employees at this facility. There are approximately 3 of these employees that help on and off, or on weekends. The facility is open 7 days a week from 8am-5pm-now until 8pm, operating at a minimal staff capacity due to days off and availability of the on and off/as needed employees. The duties for each employee can range from animal care to construction. Some of the 'construction' people are brought into animal care duties if there is no one else available or they are needed due to high numbers of patrons.

Employees can work cleaning enclosures, maintenance, running public encounters, animal care, feeding and construction duties. There are no SOPs or manuals, or official training programs set up at this facility for new or current employees.

**-Complainants and staff advise that they were never properly trained** and were told to 'figure things out' when they had questions. One situation involved the staff member being told to 'click train' the lemurs. They told the owner they had no experience and were not comfortable, and they were told to just figure it out.

This staff member ended up getting slapped by the lemur among other continued aggressive behaviors, until they refused to go in with the lemurs or run the encounters. The facility then stopped the lemur encounters. This is another example of the facility putting the staff and public in danger with the lack of knowledge, training, and experienced keepers.

**-The person in charge of tranquilizing the animals** [REDACTED] has not had a proper chemical immobilization training course or guidance on proper techniques. This has resulted in animals that have died either during the darting incident or the day after due to poor decision making and knowledge.

Mr. Fuhs advised that he is going to look for more qualified staff and people with zoo experience and asked if the USDA had any suggestions. Dr. McHenry and I did provide ideas or sources that we knew of. Mr. Fuhs advised during the exit interview that he had 'taken care' of the situations where his staff acted inappropriately by firing or demoting staffers out of their positions. He

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advised that he removed (b) (6), (b) (7)(C) from the role of (b) (6), (b) (7)(C) however she would be staying on working with birds. Mr. Fuhs stated that he is putting his (b) (6), (b) (7)(C) in charge of paperwork and other admin duties, and they are currently looking for an experienced Animal Director and someone with more zoo animal experience.

Update: The complainants have advised since the exit interview that (b) (6), (b) (7)(C) is still acting as the (b) (6), (b) (7)(C) and the staff still must go through her for everything. This may be until they find a replacement, however it is unclear at this time.

There were at least 3-4 people that were fired or left within the week after the initial inspection due to Mr. Fuhs, (b) (6), (b) (7)(C) believing they were the complainants. Several of them were not and lost their job under false accusations.

In February of 2021 the facility lost Sydney an older kangaroo that was put down under the veterinarians direction, and two Nilgai from 'possible issues during birth', however the facility did not call in the veterinarian to do a necropsy or see the animals for proper determination. This was discussed again via email or phone calls.

**Conclusion**

While the facility appears to be making positive strides in their paperwork, increased communication and protocols with their veterinarian and having corrected the past NCIs very quickly, I have serious reservations about their taking on more dangerous animals and increasing the numbers of animals without enough trained employees. I was recently informed during this affidavit the facility plans to include a new reptile area (16+ reptiles), wolf hybrids for public interactions and possibly a bear from a former/revoked USDA licensee which raises great concerns for continued non-compliance at this facility.

I'm concerned the owner has learned that he can get out of anything improper if he can do damage control after the fact, at least enough to cause any doubt to have non-compliant situations turn to his favor. My concern is for the welfare of the regulated animals, and I believe the main concern at this facility is getting more revenue by providing more animal encounters

(b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

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and inventory to bring in the public to generate revenue. I don't know that the wellbeing of the animals is of as much importance as it should be, or that they have enough properly trained staff to care for the animals and protect the public/staff.

The facility managements' (b) (6), (b) (7)(C) Mr. Fuhs) behavior is of great concern for the future of how this facility will choose to handle any problems with the animals or how they will treat employees who come to them with concerns regarding the health and safety of the regulated animals.

I feel that the multiple deaths of the animals at this facility, and how the management lied and changed their stories in order to get out of their responsibilities should be considered during this investigation. While they appear to be trying to do better with veterinary communication and paperwork, they are continuing to add onto their facility with multiple animals requiring more expertise and staff.

This facility needs to be held accountable and responsible for the deaths, mistreatment, and suffering several of the animals were put through before they died or were put to death. The behavior during the inspection, exit and multiple changes in their stories to change the narrative of what happened should be considered in the determination of what should be done with this facility.

Please consult the items turned in for this case file for details: Complaint Memo 10/7/2020. Final Wilstem Memo 10/7/2020; Memo Update 10/13/2020, and Wilstem Call Log 10/23/2020.

I have had an opportunity to make changes and corrections to this statement. I have read and reviewed this statement. To the best of my knowledge, it is true and correct. - END OF STATEMENT-

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at (b) (6), (b) (7)(C) on this 15<sup>th</sup> day of April 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.







## Inspection Report

WILSTEM INC  
P.O. BOX 88  
FRENCH LICK, IN 47432

Customer ID: 501298  
Certificate: 32-C-0265  
Site: 001  
WILSTEM INC

Type: ROUTINE INSPECTION  
Date: 15-SEP-2020

### 3.127(a)

#### Facilities, outdoor.

There are 3 camels that are being kept in a fenced pasture that does not contain any natural or artificial shade structures for the animals to get out of the direct rays of the sun. The animals have had no shade source provided since June 2020 when they were put out on the pasture for public exhibition. The average temperatures over the 3 months ranged 76-94 deg F, with the average humidity ranging 76% to 94% (weather underground).

There are two smaller pastures with 18 goats and one with 7 sheep that do have a shelter, however they do not have additional shade available by natural or artificial means. The shelter with the 18 goats is not large enough for all of the animals to get into for shade without being overcrowded, and preventing natural bodily movements in a way to prevent overheating or discomfort.

The lack of shade for regulated animals that cannot get out of the heat or from under the direct rays of the sun can cause serious health issues including physical and behavioral stress or death.

The licensee must provide shade of natural or artificial means to allow all animals kept outdoors to protect themselves from direct sunlight.

Prepared By: ANNMARIE COMPTON  
USDA, APHIS, Animal Care  
Title: ANIMAL CARE INSPECTOR

Date:  
28-SEP-2020

Received by Title: Licensee

Date:  
28-SEP-2020





## Inspection Report

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To be corrected by: October 13, 2020

### 3.127(b)

#### Facilities, outdoor.

For the past three months, there has been no shelter provided for the 3 camels to allow for them to get out of inclement weather. There are no trees, buildings or structures that are available for the animals to get into during inclement weather or out of the heat of the day. While there is a barn next to the pasture, the doors to allow the camels in have been sealed shut with wood preventing them from entering the shelter. The animals have been denied this shelter since the beginning of the drive through exhibition which started mid-June 2020 until during the time of this inspection.

The lack of a shelter by natural or artificial means, to protect the animals from inclement weather or from the heat of the day can be a source of discomfort and stress. The lack of proper shelter can cause serious health issues and death if the weather is severe due to overheating, lightening or strong winds with debris.

The licensee must provide natural or artificial shelter appropriate to the local climatic conditions for the species kept outdoors to afford them protection and prevent discomfort.

To be corrected by: Corrected during the inspection.

### 3.127(d)

#### Critical

#### Facilities, outdoor.

There is a 30 ft section of perimeter fence in the wooded area going up the hill that had four areas where the fence was raised 5-8 inches high. The bottom of the fencing is loose enough to allow it to be pushed in either direction allowing an

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USDA, APHIS, Animal Care

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## Inspection Report

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animal to get under the fence, including coyote or dog-sized animals. This area is holding multiple free roaming species including zebus, fallow deer, blackbuck, watusi, nilgai, eland, aoudad, cattle, buffalo, scimitar oryx, llama, alpacas, and water buffalo. There have been two deaths of black buck in the veld area due to an unknown predator that is suspected to be a coyote. A dead blackbuck was found on June 14, 2020 and on September 11, 2020.

Loose fencing can provide access for predators or other animals to get into the primary enclosure and chase or attack the animals, resulting in stress, injuries, and possible death.

The licensee must ensure that the perimeter fence is maintained to provide protection for the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility.

To be corrected by: November 1, 2020

### 3.125(a)

#### Facilities, general.

-There were two areas at the bottom of the fence in the kangaroo area near the barn door where there are broken wires poking inside of the enclosure allowing direct contact with the animals. Broken wires in fencing can be a source of injury.

-The kangaroo perimeter fence is only 5ft in height and is very wobbly in nature. On August 8, 2020 a kangaroo 'Perth' escaped over the fence during a public feeding encounter and left the property for two days until found.

Fenced areas that are too short to contain the regulated animals can provide a mode of escape or entry of animals or

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USDA, APHIS, Animal Care

Date:  
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Date:  
28-SEP-2020





## Inspection Report

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unauthorized people into the primary enclosure.

All indoor and outdoor housing shall be structurally sound and be maintained in good repair to protect the animals from injury and to contain the animals. And must be constructed of such materials and of such strength as appropriate for the animals involved.

To be corrected by: October 13, 2020

### 2.131(d)(2)

#### Handling of animals.

During the inspection a young child was observed climbing onto the fence at the camel feeding area, which was not attended by a keeper. While the child climbed the fence, he reached over to pet the camel and hung on the fence in direct face to face contact with the camel. There was no barrier or distance, or identifiable keeper nearby to protect the child from injury.

The lack of attendants at an animal encounter/feeding where the animal can have direct contact with the public could be a potential for injury to the person or animal.

The facility must have an attendant present during any public feeding or encounter where the animal can have direct contact with the person. If there are no attendants, then a barrier and/or sufficient distance should be in place to prevent the public from being able to have direct contact with the animals.

To be corrected: Corrected during the inspection

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Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Date:  
28-SEP-2020

Title: ANIMAL CARE INSPECTOR

Received by Title: Licensee

Date:  
28-SEP-2020







## Inspection Report

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### 2.75(b)(1)

#### Records: Dealers and exhibitors.

There are multiple animals that are missing on the inventory of the facility. The facility representatives advised there have been animals that have been born, died, euthanized and sold that have no corresponding records.

The lack of records does not allow for proper management and traceability of regulated animals.

The licensee must keep records on all animals owned, leased, held or otherwise acquired or which is transported, sold, euthanized or otherwise disposed of. They shall include any offspring born of any animal while in the licensee's possession or under their control.

To be corrected by: October 14, 2020

### 2.40(b)(2) Critical ?

#### Attending veterinarian and adequate veterinary care (dealers and exhibitors).

-February 5, 2020, according to facility staff present, a former staff member utilized a mini excavator as an unapproved method of euthanasia for a llama. The staff member was advised to shoot the animal due to illness, however the decision was made by this former employee to load the llama(while alive according to staff members) into the excavator bucket, dropped the animal into the hole and was improperly euthanized using the excavator. The gun was on site at the time; however, the employee chose not to use it.

When contacted by the USDA, the primary care veterinarian advised he was not consulted about the llama or the method of euthanasia that was used. The attending veterinarian advised if he had been contacted, he would have used euthanasia solution to put the animal down.

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USDA, APHIS, Animal Care

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28-SEP-2020





## Inspection Report

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The use of heavy machinery was not identified as an approved method of euthanasia per the facility's program of veterinary care nor the attending veterinarian.

-May 13, 2020 three eland escaped from the barn and were loose on the grounds of the facility. The employee responsible for darting animals advised that he received the drugs for the tranquilizer darts from the attending veterinarian who was present during the darting incident. He stated the veterinarian advised him what to do. The first eland was darted and taken to the barn, the second eland(M) was darted and ran into the fenced pasture followed by the remaining female. The employee stated that the female was running into the fence, panicking and he decided to try to dart her to prevent her from hurting herself. The dart missed, and the animal continued panicking until she ran into a fence post and broke her neck. The employee stated that the attending veterinarian was present during the incident and told them to try and dart the panicking eland.

After contacted by the USDA, the attending veterinarian advised that he was not present during the darting, and only knew the facility had an escaped eland and came to the clinic to pick up the tranquilizer drugs in the late afternoon. The veterinarian was not advised about the darting incident and stated he would not have approved darting a panicked animal that was already contained in a fenced pasture. According to the attending veterinarian, he had not been consulted about the incident.

If appropriate methods are not being used to prevent, control, diagnose and treat diseases and injuries of the animals it can lead to unnecessary pain, discomfort or death.

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USDA, APHIS, Animal Care

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28-SEP-2020







## Inspection Report

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The attending veterinarian must have appropriate authority for all animal care and use. Direct and frequent communication with the attending veterinarian is required to provide timely and accurate information to the attending vet.

To be correctly by: September 24, 2020

This inspection was conducted with the facility representatives and exit interview were conducted with the licensee, facility representatives and the attending veterinarian with an Animal Care VMO.

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Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Date:  
28-SEP-2020

Received by Title: Licensee

Date:  
28-SEP-2020





### Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
501298	32-C-0265	001	WILSTEM INC	15-SEP-2020

Count	Scientific Name	Common Name
000002	<i>Giraffa camelopardalis</i>	GIRAFFE
000012	<i>Osphranter rufus</i>	RED KANGAROO
000002	<i>Ursus arctos</i>	BROWN BEAR
000001	<i>Choloepus hoffmanni</i>	HOFFMANN'S TWO-TOED SLOTH
000002	<i>Lemur catta</i>	RING-TAILED LEMUR
000003		CAMEL
000002	<i>Oryx dammah</i>	SCIMITAR-HORNED ORYX
000002	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000001	<i>Loxodonta africana</i>	AFRICAN ELEPHANT
000009	<i>Equus asinus asinus</i>	DONKEY / BURRO / ASS
000005	<i>Equus quagga</i>	BURCHELL'S / GRANT'S / CHAPMAN'S / PLAINS ZEBRA
000002	<i>Elephas maximus</i>	ASIAN ELEPHANT
000017	<i>Capra hircus</i>	DOMESTIC GOAT
000014	<i>Antelope cervicapra</i>	BLACKBUCK
000002	<i>Taurotragus oryx</i>	COMMON ELAND
000007	<i>Sheep</i>	SHEEP
000006	<i>Bubalus bubalis</i>	ASIATIC WATER BUFFALO
000006	<i>Lama pacos</i>	ALPACA
000004	<i>Lama glama</i>	LLAMA
000008	<i>Bison bison</i>	AMERICAN BISON
000009	<i>Dama dama</i>	FALLOW DEER
000003	<i>Bos taurus</i>	CATTLE / COW / OX / WATUSI
000008	<i>Bos primigenius indicus</i>	ZEBU
000013	<i>Equus caballus</i>	DOMESTIC HORSE
000007	<i>Ammotragus lervia</i>	BARBARY SHEEP
000011	<i>Boselaphus tragocamelus</i>	NILGAI
000158	<b>Total</b>	







United States Department of Agriculture  
Animal and Plant Health Inspection Service

Customer: 501298  
Inspection Date: 15-Sep-2020

### Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
501298	32-C-0265	001	WILSTEM INC	15-SEP-2020



Wilstem, Inc.  
P.O Box 88  
French Lick, IN 47432

Customer ID: 501298  
Certificate: 32-C-0265

October 16<sup>th</sup>, 2020

Re: Appeal to Inspection Report dated 28-Sept-2020

To Whom It May Concern:

We are writing on behalf of Wilstem, Inc. regarding the Inspection Report dated September 28<sup>th</sup>, 2020. AnnMarie Compton, our new inspector, was present on property on September 15<sup>th</sup>, 2020 for a routine inspection. The specific sections in the report we would like to appeal can be found on pages 5-7 in the attached report, Appendix A. Specifically, item 2.40(b)(2) Attending Veterinarian and Adequate Veterinary Care, which states that, "The attending veterinarian must have appropriate authority for all animal care and use," and adds that, "Direct and frequent communication with the attending veterinarian is required to provide timely and accurate information to the attending vet," per this inspection report. We would like to address the two dates and events in this section.

February 5, 2020: This llama referenced on this date was not an animal listed on our USDA inventory as being governed by the agency. It was a private animal that had been in with our horses, donkeys, and other equine animals at the time outside of our perimeter fence. We did not open our drive thru safari until June 13<sup>th</sup>, 2020 as referenced in our attached Facebook page screenshot, Appendix B. Furthermore, it states that, "The attending veterinarian advised he was not consulted about the llama." In Appendix C, you will find two Treatment Log Sheets referencing the sick animal from 2/5/20 and 2/6/20. In these treatment logs, the llama is described as being down and not getting up on 2/5/20, and that the veterinarian's diagnosis states that it "Might be neurological." The second treatment log dated 2/6/20 states that the "Animal was lying down with a weird shape in neck," and that the treatment plan was "Euthanasia." These two logs indicate that our veterinarian, (b) (6), (b) (7)(C) was in communication with our staff regarding the treatment plan and eventual euthanasia for the sick animal. Please also reference Appendix D, a bill from the Orange County Animal Clinic, for a llama farm call on 2/6/20 further proving (b) (6), (b) (7)(C) involvement with the sick animal. We have also included a signed statement, Appendix E, from (b) (6), (b) (7)(C) acknowledging his involvement with the llama. In addition, the 3 staff members involved in the incident were simply given instructions to euthanize the animal using gunfire. As seen in attached Appendix F, they did not follow protocol from their superiors regarding the incident. According to their signed statements, they picked up the sick animal to transport it for euthanasia and it died during transport before reaching the burial location. Additionally, the inspection report incorrectly states the animal was



transported in an excavator bucket rather than the bed of a pickup truck. Corrective action was taken by Wilstem management regarding the situation as also seen in the attached Appendix F. Thus, for each of these individual reasons, we feel an infraction for an animal that wasn't governed by the USDA under the section 2.40(b)(2) that consists of many inaccuracies should be removed from the report.

May 13, 2020: On April 30, 2020, we had called for (b) (6), (b) (7)(C) to dart a zebra for a blood draw for a Coggins test for health paperwork in regard to the sale of this animal. (b) (6), (b) (7)(C) was present and attempted to dart the zebra. He was unsuccessful and then asked a staff member referenced in this inspection report to dart the zebra for him. The zebra was successfully darted, health papers were completed, and the zebra was sold. We bring up this incident in reference to this section because when speaking with Ms. Compton we had misspoke about (b) (6), (b) (7)(C) being present during the darting of the Eland. In both cases, the darting took place in exactly the same lot, in exactly the same location, only 13 days apart, which is what led to the confusion. As confident as we were, we even challenged (b) (6), (b) (7)(C) in person in regard to him forgetting about the Eland. Please see his attached statement, again in Appendix E, supporting the fact that we had contacted him. He then pointed out that he wasn't here for the Eland but had been here for the zebra. He did acknowledge, as stated in the inspection report (Appendix A page 6 and in Appendix E), that he knew the facility had an eland outside of its enclosure and came to the clinic to pick up the tranquilizer drugs in the late afternoon. The report continues in stating, "According to the attending veterinarian, he had not been consulted about the incident." Under this section, 2.40(b)(2), the violation would be if the veterinarian had not been aware of the situation. Clearly, that was not the case as the darts had been picked up from him directly.

We appreciate the opportunity to tell our "side of the story" regarding these two incidents under section 2.40(b)(2). We can be reached for questions at 812-936-4484 or by emailing us at (b) (6), (b) (7)(C)@wilstem.com. (b) (6), (b) (7)(C) can be reached by calling 812-723-2553.

Sincerely,

(b) (6), (b) (7)(C)

Jerry J. Fuhs, President

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

10-16-20

Date

10/16/20

Date

## Appendix C

Date: 2-5-20

Building/Pen: \_\_\_\_\_

Treatment Plan: Monitor

GOVERNMENT  
EXHIBIT  
14  
Page 1 of 2  
APHIS FORM 7070 (MAR 95)



## Appendix C

Date: 2-6-20

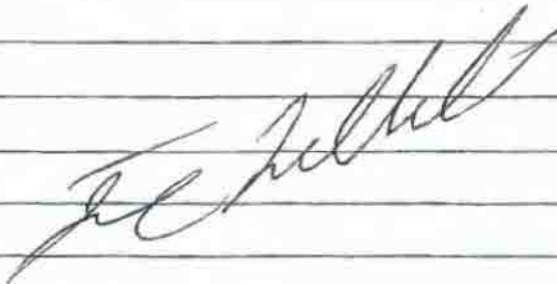
Building/Pen: \_\_\_\_\_

Treatment Plan: Euthanasia

Vet  
Review:

**This Box is for Veterinarian Use ONLY**

Or is it a situation that needs monitoring and treated only if it gets worse?    Yes    No    (Please circle)

Date:	AM: Treat	PM: Treat	IMPROVEMENT/OBSERVATION
2-6-20			Condition has worsened Vet recommends euthanasia
<i>Call your veterinarian if the animal gets worse or there is no improvement after 3 days</i>			
			

If no then has your veterinarian been contacted? Yes No (Please circle)

# Appendix D

## Orange County Animal Clinic

Page 1 / 1

www.ocanimalclinic.com

P.O. Box 58

2640 North State Road 37

Paoli, IN 47454

(812) 723-2553

Wilstern Guest Ranch  
P.O. BOX 88  
FRENCH LICK, IN 47432

Client ID: 1428  
Invoice #: 305054  
Date: 2/6/2020

Patient ID: 1426-46		Species: Other Small	Weight:	
Patient Name: Liama		Breed: Other Small	Birthday: 00/00/0000	Sex: Undetermined
	Description	Staff Name	Quantity	Total
2/6/2020	Farm Call	(b) (6), (b) (7)(C)	1.00	\$55.00
	Exam Large Animal		1.00	\$25.00
	Banamine Injection Per ml		10.00	\$10.00
	PREDEFF 2X PER ML		10.00	\$10.00
Patient Subtotal:				\$100.00
Invoice Total:				\$100.00 *
Total:				\$100.00
Invoice Balance Due:				\$100.00

Company Name \_\_\_\_\_  
Approved By \_\_\_\_\_  
Date \_\_\_\_\_  
Description animal medical  
Account # 64600-20

Balance Due: \$1,111.19

MD 2/19/20

We appreciate your patience while we are learning to use our new computer system.  
This will allow us to better meet the needs of you and your pets.



## Policy and Procedure Infraction Report

Date &amp; Time: FEB 6th, 2020

Submitted by (print and sign): (b) (6), (b) (7)(C)

Location: LLAMA PASTURE

Employee Involved:

(b) (6), (b) (7)(C)

MYSELF

Other People Present/Witnesses: NONE

Animal(s) Involved: A SICK LLAMA

Narration of Incident (attach additional pages if needed):

WE PICKED UP SICK LLAMA TO  
TRANSPORT FOR EUTHANASIA. WHILE  
BEING TRANSPORTED THE LLAMA DIED

CORRECT ACTION WOULD HAVE BEEN  
TO PERFORM EUTHANASIA, THEN  
DISPOSAL



Requires: Termination? \_\_\_\_\_ Counseling? \_\_\_\_\_ Suspension? 3 DAY

Number of Written Infractions: FIRST

Signature by employee acknowledges only that the above was discussed with management and that this will be placed in their file. Failure to sign constitutes a failure to recognize and take corrective action, thus in direct conflict and detrimental to company interests and to that of fellow employees. This constitutes undermining a business and requires immediate suspension until such time that employee has addressed this grievance with top management and it is overturned in favor of the employee. Failure to sign or address grievance within 10 days is cause for termination. Three written infraction reports in a one-year time period is also cause for termination.

Signatures:

(b) (6), (b) (7)(C)

Employee

(b) (6), (b) (7)(C)

General Manager

PRESIDENT

For Office Use Only:

Signature of reporting employee's supervisor: \_\_\_\_\_

Notes on related statements or reports:

Corrective action taken:

SEE FRONT

ANY ADDITIONAL WRITE-UPS WILL RESULT IN  
IMMEDIATE DISMISSAL

3 DAYS UNPAID LEAVE



## Policy and Procedure Infraction Report

Date &amp; Time: FEB 6th. 2020

Submitted by (print and sign): (b) (6), (b) (7)(C)

Location: LLAMA PASTURE

Employee Involved:

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)

Other People Present/Witnesses: NONE

Animal(s) Involved: A SICK LLAMA

Narration of Incident (attach additional pages if needed):

WE PICKED UP SICK LLAMA TO  
TRANSPORT FOR EUTHANASIA WHILE  
BEING TRANSPORTED THE LLAMA DIEDCORRECT ACTION WOULD HAVE BEEN  
TO PERFORM EUTHANASIA, THEN  
DISPOSAL

(b) (6), (b) (7)(C)

Requires: Termination? \_\_\_\_\_ Counseling? \_\_\_\_\_ Suspension? 3 DAY

Number of Written Infractions: FIRST

Signature by employee acknowledges only that the above was discussed with management and that this will be placed in their file. Failure to sign constitutes a failure to recognize and take corrective action, thus in direct conflict and detrimental to company interests and to that of fellow employees. This constitutes undermining a business and requires immediate suspension until such time that employee has addressed this grievance with top management and it is overturned in favor of the employee. Failure to sign or address grievance within 10 days is cause for termination. Three written infraction reports in a one-year time period is also cause for termination.

**(b) (6), (b) (7)(C)**

Employee

**(b) (6), (b) (7)(C)**

General Manager

PREB.

**For Office Use Only:**

Signature of reporting employee's supervisor: \_\_\_\_\_

Notes on related statements or reports:

Corrective action taken:

SEE FRONT

ANY ADDITIONAL WRITE-UPS WILL RESULT IN  
IMMEDIATE DISMISSAL  
3 DAYS UNPAID



## Policy and Procedure Infraction Report

Date &amp; Time: FEB 6th. 2020

Submitted by (print and sign): (b) (6), (b) (7)(C)

Location: LLAMA PASTURE

Employee Involved:

(b) (6), (b) (7)(C)

Other People Present/Witnesses: NONE

Animal(s) Involved: 1 SICK LLAMA

Narration of Incident (attach additional pages if needed):

LLAMA PICKED UP SICK LLAMA AND  
TRANSPORTED TO SITE FOR EUTHANASIA  
ANIMAL DIED DURING TRANSPORT

CORRECT ACTION WOULD HAVE BEEN  
TO PERFORM EUTHANASIA THEN  
DISPOSAL

(b) (6), (b) (7)(C)

Requires: Termination? \_\_\_\_\_ Counseling? \_\_\_\_\_ Suspension? 5 DAYS

Number of Written Infractions: FIRST

Signature by employee acknowledges only that the above was discussed with management and that this will be placed in their file. Failure to sign constitutes a failure to recognize and take corrective action, thus in direct conflict and detrimental to company interests and to that of fellow employees. This constitutes undermining a business and requires immediate suspension until such time that employee has addressed this grievance with top management and it is overturned in favor of the employee. Failure to sign or address grievance within 10 days is cause for termination. Three written infraction reports in a one-year time period is also cause for termination.

Signatures:

(b) (6), (b) (7)(C)

Employee

(b) (6), (b) (7)(C)

General Manager

For Office Use Only:

Signature of reporting employee's supervisor: \_\_\_\_\_

Notes on related statements or reports:

Corrective action taken:

SEE FRONT

ANY ADDITIONAL WRITE-UPS WILL RESULT IN  
IMMEDIATE DISMISSAL

5 DAYS UNPAID LEAVE



United States Department of Agriculture

Animal and Plant  
Health Inspection  
Service

4700 River Road  
Riverdale, MD 20737

December 1, 2020

Jerry J. Fuhs, President  
Wilstem, Inc.  
P.O. Box 88  
French Lick, IN 47432

License No. : 32-C-0265  
Customer No. : 501298

Dear Mr. Fuhs:

Your appeal of a citation on the USDA inspection report dated September 15, 2020, was thoroughly reviewed by an Animal Care appeal panel consisting of two Supervisory Animal Care Specialists, an Assistant Director, and me. The appeal is addressed below.

The citation for Section 2.40(b)(2) will remain on the report, but will be amended as follows:

Regarding the llama: This portion of the citation will be moved to Section 2.131(b)(1). All references to the llama under Section 2.40(b)(2) will be removed. The appeal team reviewed the inspection documentation and the information provided in your appeal, including your veterinarian's statement, veterinary bill, and employees' statements. The method in which a sick or injured animal was loaded and transported to the burial location prior to euthanasia did not comply with Section 2.131(b). This section requires that handling of all animals be done as expeditiously and carefully as possible in a manner that does not cause trauma, physical harm, or unnecessary discomfort to the animal.

Regarding the eland: This portion of the citation will remain on the report as written. The appeal team reviewed the inspection documentation and the information provided in your appeal, including your veterinarian's statement. Further, the appeal team discussed with the inspector her conversations with the Attending Veterinarian. The documentation and information confirmed that there is sufficient justification to uphold this noncompliance.

You should receive a copy of the amended inspection report within two weeks.

All decisions made by the appeal panel are final and represent Animal Care's final determination for this appeal.

Sincerely,

Robert Gibbens DVM  
Director, Animal Welfare Operations  
USDA, APHIS, Animal Care

**USDA Animal Care.** Ensuring humane treatment. Serving people. Doing right.

An Equal Opportunity Provider and Employer

22-00957\_000121







## Inspection Report

WILSTEM INC  
P.O. BOX 88  
FRENCH LICK, IN 47432

Customer ID: 501298  
Certificate: 32-C-0265  
Site: 001  
WILSTEM INC

Type: ROUTINE INSPECTION  
Date: 15-SEP-2020

### 3.127(a)

#### Facilities, outdoor.

There are 3 camels that are being kept in a fenced pasture that does not contain any natural or artificial shade structures for the animals to get out of the direct rays of the sun. The animals have had no shade source provided since June 2020 when they were put out on the pasture for public exhibition. The average temperatures over the 3 months ranged 76-94 deg F, with the average humidity ranging 76% to 94% (weather underground).

There are two smaller pastures with 18 goats and one with 7 sheep that do have a shelter, however they do not have additional shade available by natural or artificial means. The shelter with the 18 goats is not large enough for all of the animals to get into for shade without being overcrowded, and preventing natural bodily movements in a way to prevent overheating or discomfort.

The lack of shade for regulated animals that cannot get out of the heat or from under the direct rays of the sun can cause serious health issues including physical and behavioral stress or death.

The licensee must provide shade of natural or artificial means to allow all animals kept outdoors to protect themselves from direct sunlight.

Prepared By: ANNMARIE COMPTON  
USDA, APHIS, Animal Care  
Title: ANIMAL CARE INSPECTOR

Received by Title: Licensee

Date:  
16-FEB-2021

Date:  
16-FEB-2021





## Inspection Report

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To be corrected by: October 13, 2020

### 3.127(b)

#### Facilities, outdoor.

For the past three months, there has been no shelter provided for the 3 camels to allow for them to get out of inclement weather. There are no trees, buildings or structures that are available for the animals to get into during inclement weather or out of the heat of the day. While there is a barn next to the pasture, the doors to allow the camels in have been sealed shut with wood preventing them from entering the shelter. The animals have been denied this shelter since the beginning of the drive through exhibition which started mid-June 2020 until during the time of this inspection.

The lack of a shelter by natural or artificial means, to protect the animals from inclement weather or from the heat of the day can be a source of discomfort and stress. The lack of proper shelter can cause serious health issues and death if the weather is severe due to overheating, lightening or strong winds with debris.

The licensee must provide natural or artificial shelter appropriate to the local climatic conditions for the species kept outdoors to afford them protection and prevent discomfort.

To be corrected by: Corrected during the inspection.

### 3.127(d)

#### Critical

#### Facilities, outdoor.

There is a 30 ft section of perimeter fence in the wooded area going up the hill that had four areas where the fence was raised 5-8 inches high. The bottom of the fencing is loose enough to allow it to be pushed in either direction allowing an

---

Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Date:  
16-FEB-2021

Received by Title: Licensee

Date:  
16-FEB-2021





## Inspection Report

animal to get under the fence, including coyote or dog-sized animals. This area is holding multiple free roaming species including zebus, fallow deer, blackbuck, watusi, nilgai, eland, aoudad, cattle, buffalo, scimitar oryx, llama, alpacas, and water buffalo. There have been two deaths of black buck in the veld area due to an unknown predator that is suspected to be a coyote. A dead blackbuck was found on June 14, 2020 and on September 11, 2020.

Loose fencing can provide access for predators or other animals to get into the primary enclosure and chase or attack the animals, resulting in stress, injuries, and possible death.

The licensee must ensure that the perimeter fence is maintained to provide protection for the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility.

To be corrected by: November 1, 2020

### 3.125(a)

#### Facilities, general.

-There were two areas at the bottom of the fence in the kangaroo area near the barn door where there are broken wires poking inside of the enclosure allowing direct contact with the animals. Broken wires in fencing can be a source of injury.

-The kangaroo perimeter fence is only 5ft in height and is very wobbly in nature. On August 8, 2020 a kangaroo 'Perth' escaped over the fence during a public feeding encounter and left the property for two days until found.

Fenced areas that are too short to contain the regulated animals can provide a mode of escape or entry of animals or

Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Date:  
16-FEB-2021

Title: ANIMAL CARE INSPECTOR

Received by Title: Licensee

Date:  
16-FEB-2021







## Inspection Report

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unauthorized people into the primary enclosure.

All indoor and outdoor housing shall be structurally sound and be maintained in good repair to protect the animals from injury and to contain the animals. And must be constructed of such materials and of such strength as appropriate for the animals involved.

To be corrected by: October 13, 2020

### 2.131(d)(2)

#### Handling of animals.

During the inspection a young child was observed climbing onto the fence at the camel feeding area, which was not attended by a keeper. While the child climbed the fence, he reached over to pet the camel and hung on the fence in direct face to face contact with the camel. There was no barrier or distance, or identifiable keeper nearby to protect the child from injury.

The lack of attendants at an animal encounter/feeding where the animal can have direct contact with the public could be a potential for injury to the person or animal.

The facility must have an attendant present during any public feeding or encounter where the animal can have direct contact with the person. If there are no attendants, then a barrier and/or sufficient distance should be in place to prevent the public from being able to have direct contact with the animals.

To be corrected: Corrected during the inspection

---

Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Date:  
16-FEB-2021

Received by Title: Licensee

Date:  
16-FEB-2021





## Inspection Report

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### 2.75(b)(1)

#### Records: Dealers and exhibitors.

There are multiple animals that are missing on the inventory of the facility. The facility representatives advised there have been animals that have been born, died, euthanized and sold that have no corresponding records.

The lack of records does not allow for proper management and traceability of regulated animals.

The licensee must keep records on all animals owned, leased, held or otherwise acquired or which is transported, sold, euthanized or otherwise disposed of. They shall include any offspring born of any animal while in the licensee's possession or under their control.

To be corrected by: October 14, 2020

### 2.40(b)(2)

#### Critical

#### Attending veterinarian and adequate veterinary care (dealers and exhibitors).

May 13, 2020 three eland escaped from the barn and were loose on the grounds of the facility. The employee responsible for darting animals advised that he received the drugs for the tranquilizer darts from the attending veterinarian who was present during the darting incident. He stated the veterinarian advised him what to do. The first eland was darted and taken to the barn, the second eland(M) was darted and ran into the fenced pasture followed by the remaining female. The employee stated that the female was running into the fence, panicking and he decided to try to dart her to prevent her from hurting herself. The dart missed, and the animal continued panicking until she ran into a fence post and broke her neck. The employee stated that the attending veterinarian was present during the incident and told them to try and dart the panicking eland.

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Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Date:  
16-FEB-2021

Received by Title: Licensee

Date:  
16-FEB-2021





## Inspection Report

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After contacted by the USDA, the attending veterinarian advised that he was not present during the darting, and only knew the facility had an escaped eland and came to the clinic to pick up the tranquilizer drugs in the late afternoon. The veterinarian was not advised about the darting incident and stated he would not have approved darting a panicked animal that was already contained in a fenced pasture. According to the attending veterinarian, he had not been consulted about the incident.

If appropriate methods are not being used to prevent, control, diagnose and treat diseases and injuries of the animals it can lead to unnecessary pain, discomfort or death.

The attending veterinarian must have appropriate authority for all animal care and use. Direct and frequent communication with the attending veterinarian is required to provide timely and accurate information to the attending vet.

To be corrected by: September 24, 2020

### 2.131(b)(1) Critical

#### Handling of animals.

On February 5, 2020, according to facility staff present, a staff member (at the time) was advised to euthanize a llama by gunshot due to illness. However the decision was made by this employee to transport the llama (while alive according to staff members) to the burial site in an unapproved and inappropriate manner.

When contacted by the USDA, the primary care veterinarian advised he was not consulted about the method of transport to the burial site that was used. The attending veterinarian advised if he had been contacted, he would have had the animal euthanized at its location. However the facility chose a method of transport to the burial site that caused undue

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Prepared By: ANNMARIE COMPTON  
USDA, APHIS, Animal Care  
Title: ANIMAL CARE INSPECTOR

Date:  
16-FEB-2021

Received by Title: Licensee

Date:  
16-FEB-2021







## Inspection Report

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trauma, behavioral stress and unnecessary discomfort to the llama before death, and therefore did not comply with Section 2.131(b)(1). This section requires that handling of all animals be done as expeditiously and carefully as possible in a manner that does not cause trauma, physical harm, behavioral stress or unnecessary discomfort to the animal

To be corrected by: September 24, 2020

This inspection was conducted with the facility representatives and exit interview were conducted with the licensee, facility representatives and the attending veterinarian with an Animal Care VMO

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Prepared By: ANNMARIE COMPTON

USDA, APHIS, Animal Care

Title: ANIMAL CARE INSPECTOR

Date:

16-FEB-2021

Received by Title: Licensee

Date:

16-FEB-2021





### Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
501298	32-C-0265	001	WILSTEM INC	15-SEP-2020

Count	Scientific Name	Common Name
000002	<i>Giraffa camelopardalis</i>	GIRAFFE
000012	<i>Osphranter rufus</i>	RED KANGAROO
000002	<i>Ursus arctos</i>	BROWN BEAR
000001	<i>Choloepus hoffmanni</i>	HOFFMANN'S TWO-TOED SLOTH
000002	<i>Lemur catta</i>	RING-TAILED LEMUR
000003		CAMEL
000002	<i>Oryx dammah</i>	SCIMITAR-HORNED ORYX
000002	<i>Hystrix cristata</i>	AFRICAN CRESTED PORCUPINE
000001	<i>Loxodonta africana</i>	AFRICAN ELEPHANT
000009	<i>Equus asinus asinus</i>	DONKEY / BURRO / ASS
000005	<i>Equus quagga</i>	BURCHELL'S / GRANT'S / CHAPMAN'S / PLAINS ZEBRA
000002	<i>Elephas maximus</i>	ASIAN ELEPHANT
000017	<i>Capra hircus</i>	DOMESTIC GOAT
000014	<i>Antilope cervicapra</i>	BLACKBUCK
000002	<i>Taurotragus oryx</i>	COMMON ELAND
000007	<i>Sheep</i>	SHEEP
000006	<i>Bubalus bubalis</i>	ASIATIC WATER BUFFALO
000006	<i>Lama pacos</i>	ALPACA
000004	<i>Lama glama</i>	LLAMA
000008	<i>Bison bison</i>	AMERICAN BISON
000009	<i>Dama dama</i>	FALLOW DEER
000003	<i>Bos taurus</i>	CATTLE / COW / OX / WATUSI
000008	<i>Bos primigenius indicus</i>	ZEBU
000013	<i>Equus caballus</i>	DOMESTIC HORSE
000007	<i>Ammotragus lervia</i>	BARBARY SHEEP
000011	<i>Boselaphus tragocamelus</i>	NILGAI
000158	<b>Total</b>	





United States Department of Agriculture  
Animal and Plant Health Inspection Service

Customer: 501298  
Inspection Date: 15-Sep-2020

### Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
501298	32-C-0265	001	WILSTEM INC	15-SEP-2020





## APHIS-AnimalCare

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**From:** noreply@aphis.usda.gov  
**Sent:** Saturday, August 29, 2020 1:07 AM  
**To:** APHIS-AnimalCare  
**Subject:** USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission

**Categories:** Valid Complaints

### Details of complaint:

- Name of USDA licensee/registrant: Wilstem, Inc.
- USDA license/registration number: 32-C-0265
- City/State: French Lick, IN
- Complaint details: THIS IS AN URGENT MATTER NEEDING IMMEDIATE ATTENTION

§ 3.127 Facilities, outdoor.

(a) Shelter from sunlight. When sunlight is likely to cause overheating or discomfort of the animals, sufficient shade by natural or artificial means shall be provided to allow all animals kept outdoors to protect themselves from direct sunlight.

(b) Shelter from inclement weather. Natural or artificial shelter appropriate to the local climatic conditions for the species concerned shall be provided for all animals kept outdoors to afford them protection and to prevent discomfort to such animals. Individual animals shall be acclimated before they are exposed to the extremes of the individual climate.

Wilstem, INC., a licensed facility operating a drive thru park located at 4229 US-150 W, Paoli, IN 47454, is in direct violation of the Animal Welfare Act. The facility exhibits (3) camels outdoors in their drive thru park without providing them with shelter from inclement weather or shelter from direct sunlight. The camels are blocked off with gates from entering their barn and are left outside in the field both day and night. This non compliant activity has been an ongoing issue since the Wildlife Safari Drive Thru, operated by Wilstem, INC., started operating on June 14, 2020. These animals are in immediate and dire need of being inspected by APHIS inspectors in order to assure their safety and comfort which they have not been afforded throughout the sweltering heat of this summer. Many employees of the park have been assigned to sell carrots to attendees for public feeding of the camels and they should confirm for investigators that the camels have been denied both shelter and shade since the drive thru safari opened to the public on June 14, 2020. Persons and employees to interview for confirmation that this is not a one time issue but rather an ongoing practice are:

Jerry Fuhs-President

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Submitted To:

**Complaint Contact Information:**

Can Contact Complainer: No, I would like to remain anonymous.

Name:

Organization:

Street Address:

Apt/Suite:

City / State / Zip: , ,

Phone Number:

Email:

Submitted on: Aug 29, 2020 7:07:10 AM UTC



## APHIS-AnimalCare

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**From:** noreply@aphis.usda.gov  
**Sent:** Saturday, September 12, 2020 4:49 PM  
**To:** APHIS-AnimalCare  
**Subject:** USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission

### Details of complaint:

- Name of USDA licensee/registrant: Jerry Fuhs
- USDA license/registration number:
- City/State: Paoli, IN
- Complaint details: Please look at this place animals are during. At Wilstem Wildlife Park I have witness several issues, when the park first opened June 14th a fallow deer was killed. Was told it was a coyote. Have had several issues with the kangaroos. Several weeks ago an alpha male kangaroo escaped his enclosure which was witnessed by other guest at the park. The male kangaroo behavior had been very erratic. He jumped out of the enclosure and disappeared for several days. We were told later that Wilstem had to put him down. Last week another male has had the same behavior and they had to quit doing encounters with the guest that day but started encounters again the next day. An emu was ran over by a guest in the park and tore the foot off the leg. Several witnesses saw the animal flopping around. Had have several deaths over since the drive thru has opened in June. Camels have had no shelter or shade and they are out side 24 hours a day since June. There are bison and many other animals with out shelter 24 hours a day. Since the beginning of the drive thru in June at least one animal a month die. Kangaroo, fallow deer, black buck, audads, and an emu. Check the paper work on how many animals was bought in May and how many we have now. An Eland killed it self in May because it gotten loose. Please talk to (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) There is so much more. Animals deaths and not being reported. Mouse feces in drawers that animals food containers are stored.

Submitted To:

### Complaint Contact Information:

Can Contact Complainer: No, I would like to remain anonymous.

Name:  
Organization:  
Street Address:  
Apt/Suite:  
City / State / Zip: , ,  
Phone Number:  
Email:  
Submitted on: Sep 12, 2020 10:49:28 PM UTC





## APHIS-AnimalCare

**From:** noreply@aphis.usda.gov  
**Sent:** Monday, September 14, 2020 2:12 AM  
**To:** APHIS-AnimalCare  
**Subject:** USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission

### Details of complaint:

- Name of USDA licensee/registrant: Wilstem, INC
- USDA license/registration number: 32-C-0265
- City/State: Paoli, IN
- Complaint details: THIS IS AN URGENT MATTER NEEDING IMMEDIATE ATTENTION  
Animals are continuing to be neglected and are continuing to die at Wilstem Wildlife Park located in Paoli, Indiana. (J)

On Friday, September 11, 2020 many animals were seized from the Wildlife in Need facility in the high profile case involving former USDA licensee Tim Stark. (E) On that very same day, 63 miles away at the Wilstem Wildlife Park located in Paoli, Indiana, yet another animal died as a result of the negligence, ineptitude and willful and wanton disregard displayed by management and upper staff of the facility. Specifically the owner and President of the park, Jerry Fuhs, and the (b) (6), (b) (7)(C) (F) On this particular day Mr. Fuhs was on vacation in South Carolina and (b) (6), (b) (7)(C) was overseeing the day to day operations of the park. The following is a transcription of a few group texts sent to employees of the park that morning by (b) (6), (b) (7)(C) (F)

\*Veld is closed at the moment due to an animal care issue. I will let you know when it's open (W)

\*Opening the veld

\*Veld is on. Issue is confidential.

Veld is open

Animal issue is confidential, please do not ask (b) (6), (b) (7)(C) or I for information. (A)

(b) (6), (b) (7)(C) refers to the drive thru area of the park as the veld. Apparently another animal, possibly a blackbuck, died on "the veld" as a result of a coyote breaching the primary (T) enclosure fencing. I said another animal because on June 14 of this year, the opening day of the drive thru safari at the park, a fallow deer was killed by an animal that breached the primary enclosure and it is suspected that that death too was caused by a coyote (b) (6), (b) (7)(C) had been assisted (S) by facility staff member (b) (6), (b) (7)(C) in the "confidential issue" so inspectors know exactly who to question when investigating this incident. There was NO perimeter fence around the primary enclosure when the fallow deer was killed on June 14 and there is still NO perimeter fence to protect (O) these regulated animals three months later. Many of the animals housed on "the veld" are not allowed into the barn at night which could have also helped to protect them from coyote night attacks. Most of the animals on "the veld" have no shelter and are outdoors in the elements 24 hours a day. I highly doubt that either of these incidents were documented or reported by staff or management. (N)

When investigating the incident involving the death of the fallow deer which took place on Saturday, June 14 please interview:

- 1) Jerry Fuhs-President (F)
- 2) (b) (6), (b) (7)(C)
- 3) (b) (6), (b) (7)(C) staff member and right hand man to Jerry Fuhs
- 4) (b) (6), (b) (7)(C) staff member and (b) (6), (b) (7)(C) of Jerry Fuhs(I)
- 5) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals
- 6) (b) (6), (b) (7)(C) staff member
- 7) (b) (6), (b) (7)(C) staff member
- 8) (b) (6), (b) (7)(C) staff member (This is a very important witness and she can be reached by calling (b) (6), (b) (7)(C) (L)

When investigating the incident involving the death of the (possible) blackbuck which took place on Friday, September 11 please interview:

- 1) Jerry Fuhs-President(F)
- 2) (b) (6), (b) (7)(C)
- 3) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals
- 4) (b) (6), (b) (7)(C) staff member(D)
- 5) (b) (6), (b) (7)(C) staff member (This is a very important witness and she can be reached by calling (b) (6), (b) (7)(C)

On Wednesday, May 13, 2020 three eland (large antelope) escaped their primary (T) enclosure. One of the eland was darted by staff member (b) (6), (b) (7)(C) and moved back to a barn stall to be observed while recovering from the tranquilizer and staff member (b) (6), (b) (7)(C) was assigned the task of observing the recovery. The other two eland (H) were being tracked by (b) (6), (b) (7)(C) and contracted bear handler/owner Jeff Watson. (b) (6), (b) (7)(C) were tracking by themselves and Jeff Watson was tracking alone. (b) (6), (b) (7)(C) had the tranquilizer gun and once Jeff Watson (I) located the remaining two eland he yelled through the woods to (b) (6), (b) (7)(C) because his cell phone battery had died. (b) (6), (b) (7)(C) approached the Eland and (b) (6), (b) (7)(C) darted one of them. The two Eland ran away frantically after the one was darted and they both started bouncing off (S) of fences near their enclosure and eventually ran into a fenced in field. (b) (6), (b) (7)(C) had one dart left and attempted to dart the third eland but missed his target. The Eland that was not (C) darted was so worked up from the experience that it ran head first into a fence post and broke its neck. It was not necessary to attempt darting the third Eland because it was now contained and in my opinion that the animals should have been allowed to settle down and decompress from the traumatic experience. The dart gun and anesthesia were obtained (O) from the park's attending veterinarian (b) (6), (b) (7)(C) is a good man and is oblivious to most of what goes on at Wilster Wildlife Park. He's a true professional who (M) genuinely cares for the needs of animals. I highly doubt that this incident was documented or reported by staff or management. (P)

When investigating the incident involving the death of the eland on Wednesday, May 13, 2020 please interview:

- 1) Jerry Fuhs-President
- 2) (b) (6), (b) (7)(C) staff member and right hand man to Jerry Fuhs
- 3) (b) (6), (b) (7)(C) staff member and (b) (6), (b) (7)(C) of Jerry Fuhs
- 4) Jeff Watson-contracted bear handler/owner
- 5) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals





6 (b) (6), (b) (7)(C) staff member  
7 (b) (6), (b) (7)(C) staff member 8 (b) (6), (b) (7)(C) staff member (b) (6), (b) (7)(C) staff member (b) (6), (b) (7)(C)  
9 (b) (6), (b) (7)(C) DVM. Orange County Animal Clinic Paoli, IN. (812) 723-2553

On Thursday, July 16, 2020 a guest driving thru the Safari Drive Thru struck an Emu with (L) their vehicle. The injured emu was subsequently destroyed with a firearm by staff member (b) (6), (b) (7)(C). I highly doubt that this incident was documented or reported by staff or management.

When investigating the incident involving the death of the emu on Thursday, July 16, 2020 please interview:

- 1) Jerry Fuhs-President (A)
- 2) (b) (6), (b) (7)(C) staff member and right hand man to Jerry Fuhs
- 3) (b) (6), (b) (7)(C) staff member and (b) (6), (b) (7)(C) of Jerry Fuhs
- 4) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals
- 5) (b) (6), (b) (7)(C) staff member
- 6) (b) (6), (b) (7)(C) staff member
- 7) (b) (6), (b) (7)(C) staff member (b) (6), (b) (7)(C) staff member (This is a very important witness and she can be reached by calling (b) (6), (b) (7)(C))

On Saturday, August 8, 2020 a very large adult male Kangaroo named Perth escaped its (I) primary enclosure during business hours and the escape was witnessed by park visitors. The kangaroo was on the loose for a couple of days and I believe that the Paoli Police Department is aware of the escape. The following is a transcription of a very incriminating and confusing group text sent by upper management to employees of the park after the capture of the kangaroo. The text was sent out by Wilstem President Jerry Fuhs and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

\*Hi team. We wanted to let you know that we were able to successfully capture Perth. We took him directly to (b) (6), (b) (7)(C) while immobilized. He had been in discussions with the University of Tennessee veterinarians and they felt that his recent health decline was due to cancer. Our options were further complicated by his irradic(erratic) behavior, which is a display of neurological disorders, likely brain or spinal cancer. In consultation with (b) (6), (b) (7)(C) we have decided to humanely euthanize Perth as we feel his quality of life was rapidly declining. We know this is a very heavy message to many of you as we know how much we all loved him. We feel this was the most humane and ethical choice for him. His recent neurological agitations were putting both himself and staff at risk. Please Do Not share this information with people outside Wilstem. If a member of the public asks, please tell them that we successfully captured the animal and brought him to the veterinarian. If they continue to press, and only if pressed, you may say that he had cancer and is no longer with us. Thank you all for your time and effort in the various roles you played during this event. In addition, to the animal care team, thank you for your keen observations of Perth's health and behavioral patterns over the past few months. A huge thank you to the search and capture team as well. Special thanks to Isral, who came out on several occasions to search and made the final capture a total success. Please direct any questions you have to Jerry or (b) (6), (b) (7)(C) (N)

Sincerely,  
Jerry, President





(b) (6), (b) (7)(C)

This text raises many questions including the following:

1) " they felt that his recent health decline was due to cancer" Why was an animal (T) which was displaying symptoms of a serious health issue exposed to visitors who were actually allowed to walk inside the enclosure for direct contact during a Kangaroo Encounter? The animal should have not been exposed to the stress of interacting with the public if it was known to have been sick or displaying symptoms of sickness.

2) "Our options were further complicated by his irradic(erratic) behavior , which is a display of neurological disorders, likely brain or spinal cancer" Again, why was an animal which was displaying symptoms of a serious health issue exposed to visitors who were actually allowed to walk inside the enclosure for direct contact during a Kangaroo Encounter? The animal should have not been exposed to the stress of interacting with the public if it was known to have been sick or displaying symptoms of sickness.

3) " His recent neurological agitations were putting both himself and staff at risk" If upper management was actually aware that Perth's neurological agitations were a risk to both the staff and to the animal itself then why was the animal allowed to interact with the public and staff during public Kangaroo Encounters? Wilster Wildlife Park only has adult employees therefore if upper management felt that adult staff members were being put at risk while interacting with Perth then why in the world were members of the general public, WHICH INCLUDED CHILDREN OF ALL AGE AND SIZE, be allowed to interact with a six foot dangerous Kangaroo? Wilster Wildlife Park upper management knowingly risked the safety of its staff members as well as the safety of the public.(O)

4) "If they continue to press, and only if pressed, you may say that he had cancer and is no longer with us" Was a necropsy ever performed to determine the actual cause of Perth's physical symptoms or was a guess scientific enough?(N)

5) " In addition, to the animal care team, thank you for your keen observations of Perth's health and behavioral patterns over the past few months" Again, why was an animal which was displaying symptoms of a serious health issue, for the past few months, exposed to visitors who were actually allowed to walk inside the enclosure for direct contact during a Kangaroo Encounter? The animal should have not been exposed to the stress of interacting with the public if it was known to have been sick or displaying symptoms of sickness.(9)

6) "Special thanks to Isral, who came out on several occasions to search and made the final capture a total success" Isral needs to be interviewed. (14)

7) " In consultation with (b) (6), (b) (7)(C) we have decided to humanely euthanize Perth as we feel his quality of life was rapidly declining" (b) (6), (b) (7)(C) needs to be interviewed.

When investigating the incident involving the escape and death of the kangaroo please interview:

1) Jerry Fuhs-President

2) (b) (6), (b) (7)(C) staff member and right hand man to Jerry Fuhs

3) (b) (6), (b) (7)(C) staff member and (b) (6), (b) (7)(C) of Jerry Fuhs

4) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals

5) (b) (6), (b) (7)(C) staff member



- 6) (b) (6), (b) (7)(C) staff member
- 7) (b) (6), (b) (7)(C) staff member (b) (6), (b) (7)(C) staff member (This is a very important witness and she can be reached by calling (b) (6), (b) (7)(C))
- 8) (b) (6), (b) (7)(C) DVM. Orange County Animal Clinic Paoli, IN. (812) 723-2553

Former employee (b) (6), (b) (7)(C) MUST be interviewed because he was an eyewitness to the death of kangaroos and was personally instructed by Wilstem Wildlife Park President Jerry Fuhs to alter USDA paperwork in an attempt to hide the deaths. Mr. Fuhs has only been a licensee for a little over three years however he has been guilty of critical AWA violations from the outset and (b) (6), (b) (7)(C) will attest to this. He will talk. (b) (6), (b) (7)(C)

Wilstem Wildlife Park employee (b) (6), (b) (7)(C) MUST be interviewed because he was responsible for burying many of the animals and therefore knows the location of the graves. He is rumored to also be aware of other deaths where the animals were just tossed into the woods without being buried. He will talk.

Many of the animals at the park came from auctions and also from USDA licensee (b) (6), (b) (7)(C) of the Timbavati Wildlife Park located in Wisconsin Dells. I believe that some of the animals at Wilstem Wildlife Park are on loan from (b) (6), (b) (7)(C). His number is (b) (6), (b) (7)(C).

Please go to the Roos and Crew building and look at the mouse droppings in the food storage and preparation area. If you open the cabinet drawers you should see food prep utensils exposed to droppings. Go to the back room where feed and bedding is stored. Often times food bags are left open. (2020)

The facility exhibits (3) camels outdoors in their drive thru park without providing them with shelter from inclement weather or shelter from direct sunlight. The camels are blocked off with gates from entering their barn and are left outside in the field both day and night. This non compliant activity has been an ongoing issue since the Wildlife Safari Drive Thru, operated by Wilstem, INC., started operating on June 14, 2020. These animals are in immediate and dire need of being inspected by APHIS inspectors in order to assure their safety and comfort which they have not been afforded throughout the sweltering heat of this summer. Many employees of the park have been assigned to sell carrots to attendees for public feeding of the camels and they should confirm for investigators that the camels have been denied both shelter and shade since the drive thru safari opened to the public on June 14, 2020.

Persons and employees to interview for confirmation that this is not a one time issue but rather an ongoing practice are:

- 1) Jerry Fuhs-President
- 2) (b) (6), (b) (7)(C)
- 3) (b) (6), (b) (7)(C)
- 4) [REDACTED]
- 5) [REDACTED]
- 6) [REDACTED]

7) (b) (6), (b) (7)(C)  
8) [REDACTED]  
9) [REDACTED]  
10) (b) (6), (b) (7)(C)  
11) [REDACTED]  
12) [REDACTED]  
13) [REDACTED]

Submitted To:

**Complaint Contact Information:**

Can Contact Complainer: No, I would like to remain anonymous.

Name:

Organization:

Street Address:

Apt/Suite:

City / State / Zip: , ,

Phone Number:

Email:

Submitted on: Sep 14, 2020 8:11:42 AM UTC



## APHIS-AnimalCare

**From:** noreply@aphis.usda.gov  
**Sent:** Monday, September 14, 2020 6:36 AM  
**To:** APHIS-AnimalCare  
**Subject:** USDA APHIS ANIMAL CARE - Animal Welfare Complaint Submission

### Details of complaint:

- Name of USDA licensee/registrant: Wilstem, Inc.
- USDA license/registration number: 32-C-0265
- City/State: Paoli, IN
- Complaint details: The Cruel, Inhumane and Bizarre Death of a Llama at the Wilstem Wildlife Park located in Paoli, Indiana

On Wednesday February 5, 2020 the bucket of a mini excavator (a tracked or wheeled vehicle with a slew of uses in construction) was used by a Wilstem Wildlife Park employee to crush the skull of a llama as a method of euthanasia. Contracted bear handler Jeff Watson was back at the bear habitat when he received a telephone call from Wilstem staff member (b) (6), (b) (7)(C) asked Watson if he was in with his bears because he (b) (6), (b) (7)(C) was going to put an animal down with a firearm and he didn't want to endanger Watson's life by scaring or upsetting the bears with the startling sound of the gunfire. Sometime later Watson approached (b) (6), (b) (7)(C) at the Roos and Crew building and told him that he never heard a gunshot and wanted to know what happened. (b) (6), (b) (7)(C) informed Watson that (b) (6), (b) (7)(C) didn't think that the gunshot would be effective so he (b) (6), (b) (7)(C) chose to crush its skull with the bucket of the heavy equipment. When the president of Wilstem Wildlife Park, Jerry Fuhs, learned of the incident he was outraged, as he should have been. Mr. Fuhs chose to handle the situation by instructing the three staff members present during the incident to not share the story with anyone. The three staff members present were (b) (6), (b) (7)(C) with (b) (6), (b) (7)(C) reportedly being the one who committed the egregious act. (b) (6), (b) (7)(C) informed (b) (6), (b) (7)(C) of the incident and when Fuhs learned that (b) (6), (b) (7)(C) had disregarded the order to not speak of the matter he summarily fired (b) (6), (b) (7)(C) was soon brought back as an employee and from my understanding all three employees received some form of punishment for the incident. Either time off or working without pay was what I had heard. Mr. Fuhs was upset about the incident and did not condone the killing of the animal in such a horrible manner but the concern is how he handled the aftermath of the incident. Of course the Program of Veterinary Care did not list the use of a mini excavator as a suitable and acceptable form of euthanasia therefore a critical non compliance of the AWA standards was committed by Wilstem staff but did Mr. Fuhs report or document the incident as required. Please note that (b) (6), (b) (7)(C) was not working at the park at the time of the incident. When investigating the incident involving the death of the llama which took place on Wednesday, February 5, 2020 please interview:

- 1) Jerry Fuhs-President
- 2) (b) (6), (b) (7)(C) staff member and right hand man to Jerry Fuhs
- 3) (b) (6), (b) (7)(C) staff member who is responsible for burying many of the animals who was present during the incident.
- 4) (b) (6), (b) (7)(C) staff member who was present during the incident.
- 5) (b) (6), (b) (7)(C) staff member who was present during the incident.



6 (b) (6), (b) (7)(C) staff member (This is a very important witness who heard Mr. Fuhs chastising staff for committing such an unspeakable act. She can be reached by calling (b) (6), (b) (7)(C)

7) Jeff Watson-Contracted bear handler/owner

Submitted To:

**Complaint Contact Information:**

Can Contact Complainer: No, I would like to remain anonymous.

Name:

Organization:

Street Address:

Apt/Suite:

City / State / Zip:

Phone Number:

Email:

Submitted on: Sep 14, 2020 12:35:32 PM UTC





CFR:3.127(a);3.127(b)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 18:22:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Three camels in open pasture with no access to barn, shelter or trees for shade. There is no natural or artificial method to provide shade, and the opening has been closed off with wood since June 2020





CFR:3.127(a);3.127(b)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 18:22:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Three camels in open pasture with no access to barn, shelter or trees for shade. There is no natural or artificial method to provide shade, and the opening has been closed off with wood since June 2020

amazon.com

Print this page for your records.

**Order Placed:** September 16, 2020**Amazon.com order number:** 112-4759498-4032240**Order Total:** \$384.95**Shipped on September 20, 2020****Items Ordered**

1 of: *WindscreenSupplyCo Heavy Duty Black Knitted Mesh Tarp with Grommets*  
60-70% Shade (12 FT. X 16 FT.)

Sold by: *WindscreenSupplyCo* ([seller profile](#))

Condition: New

**Price**

\$59.95

**Shipping Address:**

wilster ranch  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
United States

\* Shade cloths and  
materials

**Shipping Speed:**

FREE Prime Delivery

**Shipped on September 20, 2020****Items Ordered**

2 of: *WindscreenSupplyCo Heavy Duty Black Knitted Mesh Tarp with Grommets*  
60-70% Shade (12 FT. X 16 FT.)

Sold by: *WindscreenSupplyCo* ([seller profile](#))

Condition: New

**Price**

\$59.95

**Shipping Address:**

wilster ranch  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
United States

**Shipping Speed:**

FREE Prime Delivery

**Shipped on September 22, 2020****Items Ordered**

2 of: *WindscreenSupplyCo Heavy Duty Black Knitted Mesh Tarp with Grommets*  
60-70% Shade (20 FT. X 20 FT.)

Sold by: *WindscreenSupplyCo* ([seller profile](#))

Condition: New

**Price**

\$89.95

22-00957\_000144



Wilston Maintenance



NORTH GOSPEL ST ST  
PROLI, IN 47351  
812-723-0054

Ticket: 370226

Date: 9/18/20

Time: 1:01 PM

Store: 1526

Register: 2

Cashier: Laura

Item	Qty	Price	Amount
JS TARP 12FT X 16FT 60Z MESH 3000407	1	129.99	129.99

\*Shade  
cloth

XRT ROPE LOCK 350 LBS 1127584	1	14.99	14.99
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XRT ROPE LOCK 350 LBS 1127584	1	14.99	14.99
----------------------------------	---	-------	-------

HOPKINS 12000LB RPTNO RAMPS 36IN 1100757	1	47.99	47.99
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Total 202.96

Master Card  
Auth: 11110  
Terminal: 10  
Crypt: 1111  
AID: 1111  
app: 1111

maint tools  
71910-10  
MD 10/23/20

Company Name \_\_\_\_\_  
Approved By \_\_\_\_\_  
Date \_\_\_\_\_  
Description \_\_\_\_\_  
Account # \_\_\_\_\_



Wilstem Inc  
General Ledger

For the Period From Jan 1, 2020 to Dec 31, 2021

Filter Criteria includes: 1) IDs from 52220-20 to 52220-20. Report order is by ID. Report is printed with Hide Period Subtotals on Multi-Period Report and in Detail Format.

Account ID Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Balance
52220-20	6/1/20			Beginning Balance			
Drive-Thru Safari Park	6/13/20	Jun7-Jun13, 2020	PJ	(b) (6), (b) (7)(C)	1,500.00		
	6/20/20	Jun14-Jun20, 2020	PJ		1,500.00		
	6/27/20	Jun21-Jun27, 2020	PJ		1,500.00		
	6/30/20	Jun28-Jun30, 2020	PJ		642.86		
	7/4/20	Jul1-Jul4, 2020	PJ		857.14		
	7/11/20	Jul5-Jul11, 2020	PJ		1,500.00		
	7/18/20	Jul12-Jul18, 2020	PJ		1,500.00		
	7/25/20	Jul19-Jul25, 2020	PJ		1,500.00		
	7/31/20	Jul26-Jul31, 2020	PJ		1,285.72		
	8/1/20	Aug1, 2020	PJ		214.28		
	8/1/20	1510	PJ	Fuhs Construction Company - Drive Thru 8-7/20 PR	3,204.00		
	8/8/20	Aug2-Aug8, 2020	PJ	(b) (6), (b) (7)(C)	1,500.00		
	8/15/20	Aug9-Aug15, 2020	PJ		1,500.00		
	8/15/20	1513	PJ	Fuhs Construction Company - Drive Thru 8/21/20 PR	2,556.00		
	8/22/20	Aug16-Aug22, 202	PJ	(b) (6), (b) (7)(C)	1,500.00		
	8/29/20	Aug23-Aug29, 202	PJ		1,500.00		
	8/29/20	1516	PJ	Fuhs Construction Company - Drive Thru Park 9/4/20 PR	2,556.00		
	8/31/20	Aug30-Aug31, 202	PJ	(b) (6), (b) (7)(C)	428.57		
	9/5/20	Sep1-Sep5, 2020	PJ		1,071.43		
	9/12/20	Sep6-Sep12, 2020	PJ		1,500.00		
	9/12/20	1519	PJ	Fuhs Construction Company - Drive Thru Park 9/18/20 PR	1,296.00		
	9/19/20	Sep13-Sep15, 2020	PJ	(b) (6), (b) (7)(C) Terminated 9-15-2020	642.86		
	9/26/20	1521	PJ	Fuhs Construction Company - Drive Thru Park 10/2/20 PR	1,296.00		
	10/10/20	1531	PJ	Fuhs Construction Company - Drive Thru Park 10/16/20 PR	1,296.00		
	10/24/20	1533	PJ	Fuhs Construction Company - Drive Thru Park 10/30/20 PR	972.00		
	11/21/20	1540	PJ	Fuhs Construction Company - Drive Thru Safari Park 11/27/20	324.00		
				Change	35,142.86		35,142.86
	12/31/20			Fiscal Year End Balance			35,142.86
	1/1/21			Beginning Balance			
	12/31/21			Ending Balance			

Construction labor  
for sun shades  
and veid.



Gmail

(b) (6), (b) (7)(C)@santaslodge.com&gt;

## FW: IMG\_4825.jpeg

1 message

(b) (6), (b) (7)(C)@wilstern.com>  
To: (b) (6), (b) (7)(C)@santaslodge.com (b) (6), (b) (7)(C)@santaslodge.com>

Thu, May 6, 2021 at 12:57 PM

From: (b) (6), (b) (7)(C)@wilstern.com>  
Sent: Tuesday, September 29, 2020 2:56 PM  
To: Annmarie.Compton@usda.gov  
Subject: Fwd: IMG\_4825.jpeg

\* Camel sun shade  
email sent on  
9/29/20

Camel sun shade up!

Sent from my iPhone

Begin forwarded message:

From: (b) (6), (b) (7)(C)  
Date: September 29, 2020 at 2:20:22 PM EDT  
To: (b) (6), (b) (7)(C)@wilstern.com>  
Subject: IMG\_4825.jpeg





Sent from my iPhone





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 4299 U.S. Highway 150, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C). My mailing and physical residential address is (b) (6), (b) (7)(C).

I began working at Wilstem, Inc. as a high school intern. I began working part time in 2015 and was hired on full time around year 2016. I have worked in almost every area of the facility. I was asked to be aid to (b) (6), (b) (7)(C) in caring for animals in the drive thru safari during first season of being open and some care of those animals in the long barn during initial quarantine period prior to opening of the drive thru. I have helped in most all areas of work for Wilstem including housekeeping, ziplining, ATV tours, and horseback riding. I help with all the animal care including guiding and leading animal encounters with guests. Currently I am stationed mostly in the "Roo's and Crew" barn. I have been here since the beginning of the wildlife park. I do not know what my formal title is called. I have requested to attend seminars or some type of formal training, but Wilstem, Inc. has not approved.

Facilities Outdoors

I do recall some shade cloths being put up for the camels. The long barn was being used for their enclosed shelter. I did notice that when the camels came inside to be fed their humps would rub on the top of the door frame. At one point they were blocked out of the long barn. The camels were fed in the long barn during quarantine period and were switched to being fed outside of the barn after they were added to the safari. They were fed at the gate after guests were gone for the day and the safari was closing. Camels now have a new enclosure and shelter that is tall enough.

The perimeter fence was put up rather quickly and attention to detail wasn't priority. There was a

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.



## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

spot in the fence that had been hit by a tractor and was not repaired until after the September 15, 2020 inspection. Rip rap has been put down and other areas have been staked down since the September 15, 2020 inspection.

I have found difficulty in addressing issues with facilities to Jerry Fuhs. He has referred me to (b) (6), (b) (7)(C). I am usually told that it will be taken care of but is usually delayed or pushed to the back burner. I do not feel like I am heard a lot of times or viewed as exaggerating or whining.

There were issues with predators like coyotes getting in and killing some of the animals on the veld. There is a lot of "hush hush" about these issues. I personally have found 2 blackbuck that had been killed by a predator. I found one in late summer of 2020 and one in the fall of 2020. I count heads when I work on the veld and try to locate anything that is missing. I picked up the carcasses of said animals and brought to Isral or drop off in specified location for disposal to be done by himself. That is where my involvement ended. I do not fill out any forms or do any other reporting.

I have heard of and found other animals to be missing but do not have any other knowledge as far as what happened to them. (b) (6), (b) (7)(C) was hired to take care of the animals on the veld. She and (b) (6), (b) (7)(C) would have direct knowledge and be responsible for these events. On occasion (b) (6), (b) (7)(C) would also be involved with these events.

We have been issued two-way radios and have started morning meetings to update staff on the day's activities or updates on animal health but are few and far between. I was gathered with 2-3 other colleagues discussing our schedules and Isral reported to Jerry that we were "having a meeting". I do not know why that was concerning to him. Jerry then called the individual that was holding the meeting and she was told not to make a habit of it.

I feel like the management of the facility has improved minorly since (b) (6), (b) (7)(C) has come on board, but has got a very long way to go. At one-point Isral was to be in charge of the paperwork but that did not last any length of time as it became old news to him quite quickly. I

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.





**AFFIDAVIT**

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

was helping (b) (6), (b) (7)(C) on the veld, but when I expressed my opinion on some things it was used against me and ultimately I was singled out and removed from those duties.

**Facilities General**

The kangaroo enclosure was put up quickly and not very sturdy. The attitude was "let's just get a fence up".

We did have one kangaroo get out over the fence. I went out and helped look for the kangaroo. This happened during open hours. He was "Perth". We did get 2 kangaroos from Ringling several years ago, they were Melbourne and Perth. Something happened to this Perth, I do not remember what. Then Wilstem, Inc. got another male kangaroo and named him Perth. The second Perth is the one that escaped. I did not find "Perth" after he escaped. To my knowledge (b) (6), (b) (7)(C) was involving in the finding of the animal. All I know is that he did not return here. There was message sent out to the facility staff that Perth was euthanized due to some neurological issue. The only thing I noticed about him was he seemed anxious, but otherwise healthy. When he escaped, he was hopping quickly around the enclosure and ran into the fence and kind of flipped over the fence and escaped the perimeter fence through the park entrance.

**Handling of Animals**

During the September 15, 2020 a child was seen by the inspector climbing on the fence face to face with the camels with no attendant present. I did not personally witness this.

Have always been encouraged to wear Wilstem, Inc. shirts and now we have "Wilstem Staff" shirts.

**Records**

After the September 15, 2020 inspection we have been recording feeding and animal care schedules. I have not kept a personal journal or record. I have no knowledge of any animals not being fed to encourage interaction with guests.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

**Attending Veterinarian and Adequate Veterinary Care**

Approximately I found the llama down in area where the draft horse is now housed. I told Jerry that it was down and virtually unresponsive. I felt as though it was not going to make it. It did not get up when I came in the enclosure. This came on suddenly I did see or know of any illness or injury. It was an older animal. I learned that the llama was to be euthanized. I do not recall calling (b) (6), (b) (7)(C). There had been a different llama that was in with the horses and got hurt in which I did contact (b) (6), (b) (7)(C) to assist. I was presented Veterinary Diagnosis/Observation Treatment Log sheets dated Feb 5, 2020 and Feb 6, 2020 to read by Investigator (b) (6), (b) (7)(C). To my recollection these pertain to the llama that was in with the horses, not the llama that was moved prior to euthanasia.

I found out that the llama had been killed by word of mouth. I reported what I heard to Jerry Fuhs. He called (b) (6), (b) (7)(C) and me to the feed room in the 'roo barn. I was in the room but stood back while he addressed them to find out what happened. I heard one of them confirm to Jerry what happened. I was not present when he spoke to (b) (6), (b) (7)(C).

I understand the need for euthanasia, but it is very difficult for me to do. There is an appropriate way to euthanize and this animal should have been put down before it was moved. However, I feel that it was moved prior to euthanasia in order to get it out of public view. As far as I know euthanizing an animal with the gun was not typically the duty of (b) (6), (b) (7)(C). That has been assigned to (b) (6), (b) (7)(C) or Jerry, if not one of them then (b) (6), (b) (7)(C).

I can call or text (b) (6), (b) (7)(C) as needed without prior permission depending on what is needed but usually if I do so it is reported to Jerry, (b) (6), (b) (7)(C).

I only heard about the emu getting run over by a guest. I did not see it.

I am not certain of the exact time or date when I noticed that Daisy, the donkey, was limping. I had the farrier come out to work on her feet. He stated that she was foundered. We did some maintenance to make her more comfortable. In the next couple day I was doing a routine check

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 17 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



**AFFIDAVIT**

I, **(b) (6), (b) (7)(C)** being duly sworn on oath make the following statement

and I discovered that her leg was broken. I reported to **(b) (6), (b) (7)(C)** that she needed to be euthanized immediately. He stated that he would take care of it. I went home to care for my personal animals. The next morning, I saw that Daisy was still in the pasture and she had not been euthanized and now the bone was protruding through the skin. I am not certain who discovered her on this morning. I believe that **(b) (6), (b) (7)(C)** euthanized the animal.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

**(b) (6), (b) (7)(C)**

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

**(b) (6), (b) (7)(C)**

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.



## AFFIDAVIT

(b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 4299 U.S. Highway 150, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C). My mailing and physical residential address is (b) (6), (b) (7)(C).

I began working for Wilstem, Inc. in late spring of 2020. I also work for my (b) (6), (b) (7)(C) at his zoo in Florida and in TN. I have also worked at the North Georgia Zoo, and at Zoo Miami on the carnivore team, brooder hatchery and quarantine animal health team and served as the assistant curator of the birds at the American Eagle foundation. I hold my own USDA APHIS Broker's license.

Facilities Outdoors

On September 15, 2020 I was asked to accompany the Animal Care Inspector and (b) (6), (b) (7)(C) during her visit. Jerry Fuhs was out of town. The camels were out in the sun and the inspector recommended that they have shade cloths. I do not know why the barn doors were closed. Typically, they had access to the barn to the best of my knowledge.

There were gaps under the fence due to rain and erosion. When the facility was first built the thought was to keep animals in as opposed to keeping predators out. I had mentioned it to Jerry and (b) (6), (b) (7)(C) that it was needing fixed. Since the September 15, 2020 inspection it has been rectified. I think that at some point we will need to probably install hot wire or chain link skirts. I have discussed these options with Jerry and Isral.

(b) (6), (b) (7)(C) is now in charge of reporting all birth and death loss to USDA. At that time there was no one person responsible for reporting this information. When I first started, I was asked to

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615





**AFFIDAVIT**

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

cover several responsibilities. I reported the loss of the blackbuck to Jerry. As a new facility there were a lot of new processes and procedures to learn.

With the COVID-19 pandemic it was difficult to keep staffed. The drive through was a new addition and an aspect of Wilstem, Inc. that is spontaneous visit as opposed to being planned or reserved.

**Facilities General**

The Roo enclosure was not part of my responsibilities

I mentioned to Jerry that the fence was only 5' tall. Regulations in Florida called for 8' tall fencing.

I do know that we had been concerned about "Perth" for some neurological issues. He had been darted and taken to (b) (6), (b) (7)(C) for an exam. He had been demonstrating signs of agitation and nervousness which was abnormal behavior for this animal.

I was on premises the day Perth escaped, but I did not see it happen. When I was called to help look for Perth he was thought to be up behind the red barn. (b) (6), (b) (7)(C) Jerry, (b) (6), (b) (7)(C) maybe (b) (6), (b) (7)(C) and I were out looking for several hours. I had to go back to Wilstem to take care of the daily shut down of my area. I was helping again when he was darted and took off. We continued to look for several more hours until it was too dark to see. I rejoined (b) (6), (b) (7)(C) the next morning and I was with him when Perth was spotted off property. There had already been discussion with (b) (6), (b) (7)(C) about euthanasia for his neurological issues. Perth was very agitated and would run away from us every time we would approach. The decision was made to euthanize him to prevent any injury to the animal or humans in a possible traffic collision.

**Handling of Animals**

On September 15, 2020 during the inspection a child was climbing on the fence face to face with the camels with no attendant present. The attendant had gone to lunch. The situation was rectified immediately.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 18 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.



**AFFIDAVIT**

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

**Records**

All of the records were behind when I arrived. A staff member (b) (6), (b) (7)(C) was doing some, someone else did some and I was tasked with bringing the records up to date and then keeping them up to date. The records were only up to date up to 2019. (b) (6), (b) (7)(C) came on board, I assisted with the work with to bring the records up to date.

**Attending Veterinarian and Adequate Veterinary Care**

I was not present for the death of the llama or the escape of the elands from the long barn.

I was not present when the emu was run over on the drive through.

Since I have been here, we sell the bird seed in little cups. Most zoo's dip sticks in glue to feed the seed from. Guests at Wilstem, Inc feed from the palm of their hands.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 4299 U.S. Highway 150, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. My cell phone number is (b) (6), (b) (7)(C) and my email address: (b) (6), (b) (7)(C)@wilstem.com. My mailing and physical residential address is (b) (6), (b) (7)(C)

I began working for Jerry as a junior in high school mowing yards etc. at his home. Went to IU as a business management major. After 2 years of college I went to work for my (b) (6), (b) (7)(C) at Baker Concrete then I worked as a project manager all over the country. I started my own construction company and worked as a sub-contractor for Jerry Fuhs. I then went to work for Jerry Fuhs as a construction project manager. We build all our own structures here at Wilstem, Inc. I also work as part of the emergency response team as needed. I help manage staff, help them find the answers to their questions.

I have typically been the contact person to walk through the inspections with the Animal Care Inspector(s). I am familiar with the entire property. We are now getting enough specialized staff to cover each of the areas.

**Facilities Outdoors**

There were some gaps in the perimeter fence and due to the terrain, there were some 5"- 8" gaps between the fence and the ground. There has also been some erosion from the rain and the hills. We were working pretty quickly to get the fence up and ready for animals. We built the fence in the early part of 2020, probably the winter.

After the September 15, 2020 inspection we came back through and put rip rap in the washed places. We have also staked down the bottom of the fence and strengthened the fence.

There were some animals that had been killed by coyotes. We set snares and night vision

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150, Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS, AUTHORITY NO 3615.





**AFFIDAVIT**

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

cameras to keep an eye out for them. We have probably snared 10 coyotes. I know of 2 animals, I think blackbucks, but I do not know of any others. (b) (6), (b) (7)(C) has taken over care of veld. (b) (6), (b) (7)(C) checks the fence now as part of her duties.

During the September 15, 2020 the AC Inspector pointed out that the camels needed access to the barn and outdoor shade. On the day of the inspection I do not know why the barn was closed. I am sure that it was a temporary reason like cleaning or something. There was no on-going construction project in the long barn.

**Facilities General**

The outdoor Roo enclosure fence was put up quickly as a temporary fence. The wire was not wrapped fully around the brace post.

I did not see the kangaroo escape, as I was off, but it was acting odd. We had the veterinarian examine him previously. I do remember helping put the kangaroo into the truck for Jerry to take to (b) (6), (b) (7)(C). I received a phone call late in the day to come to Wilster and help look for Perth, the large male kangaroo. Jerry (b) (6), (b) (7)(C) and I searched for him. I got a phone call around 8:00 p.m. that he had been spotted around Jerry's cabin. I had called the Orange County Sheriff's office to notify them. I shot him with a tranquilizer dart, and he took off. Jerry and I and the sheriff's deputies looked until it was too dark. The next morning, he was spotted on the neighbor's property. We had discussed with (b) (6), (b) (7)(C) and it was determined that he should be euthanized. I was able to shoot him with my rifle. Jerry and I transported to (b) (6), (b) (7)(C) office for a necropsy.

After the September 15, 2020 inspection all the kangaroo fence was replaced with the 8' fence.

**Handling of Animals**

On day of the September 15, 2020 inspection a child was seen climbing on the fence face to face with the camels with no attendant present. I believe it was lunch time and the attendant left his/her post without a replacement being present. If I see this happening, I will call for someone to come out.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

**Records**

In or around 2018/2019 (b) (6), (b) (7)(C) and I were attempting to keep the paperwork up. Inspector Juan Arango had shown us the acquisition/disposition forms and the program of veterinary care forms. I helped with this until (b) (6), (b) (7)(C) started looking after this.

**Attending Veterinarian and Adequate Veterinary Care**

I was on vacation when the llama died. I was the designated person to use the rifle for euthanasia. It was kept at Jerry's house at that time. We now keep the rifle and the darting gun in the safe in the "Basecamp" office. Jerry, (b) (6), (b) (7)(C) and I have the combination to the safe.

**The eland escapes**

On May 13, 2020 three elands escaped their primary enclosure but never left the Wilstem, Inc. property as far as I'm aware. Upon arriving at work, someone called and informed me of the escape. (b) (6), (b) (7)(C) and I started looking for them. The first one we found and darted easy and transported back to the barn. We looked for approximately 2 hours and found the other male and the female. They ran into another enclosure where they were trapped. I darted the male and he went down. The female was freaked out and I took a shot at her. The dart went over her back and she ran headfirst into a fence post and broke her neck.

I did not see the emu get run over. A guest called in and stated that he had run over the emu on the drive through path. The leg was broken in half and the bird was trying get up and stand on it. We got the bird off the path and out of sight of guests. I put the bird on the ground and shot it in the head.

I heard about the broken leg of Daisy the donkey, but I have no firsthand knowledge.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS.  
AUTHORITY NO 3615.





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 4299 U.S. Highway 150, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C). My mailing and physical residential address is (b) (6), (b) (7)(C).

I began working for Fuhs construction approximately 8 years ago. Approximately 90% of my time is spent at Wilstem, Inc. I am not part of the daily care taking, animal husbandry, or feeding staff. I do help with emergency response and the capture team. I primarily work as a building project manager.

I was out of state on vacation the day the kangaroo had escaped

On May 13, 2020 I was making my rounds through the barns, I do this every day. I discovered three elands escaped their primary enclosure but never left the Wilstem, Inc. property as far as I'm aware. I walked through the long barn about 3:30 in the afternoon before and all 3 elands were in the quarantine stall. There was an evening feeding crew would have come through after that. I do not know if the latch failed or if someone missed getting it latched. I yelled to some of the staff who were feeding and grooming the horse. I asked if the elands had been moved. They responded no; they had not been moved. I told them they had escaped. (b) (6), (b) (7)(C) and I notified Jerry and (b) (6), (b) (7)(C). He could not come right away with the darts and gun so Jerry went to meet him and pick up the gun and darts. It was raining and (b) (6), (b) (7)(C) and I started tracking them. We found them behind the elephant barn. The first female we found and darted her and transported back to the barn. The other 2 took off up the hill. I was able to keep eyes on them. They ran to the outside of the elephant enclosure around the outside. This worked as a funnel

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

and we were able to get them into the zebra enclosure where they were trapped. By this time (b) (6), (b) (7)(C) had arrived. There was still no way to get them back into the barn. (b) (6), (b) (7)(C) thought it would be best to dart them in the dry lot. (b) (6), (b) (7)(C) darted the male and he went down. The female was excited and running around. The wind had picked up and the and the dart went over her back and she ran headfirst into a fence post and broke her neck. I was glad (b) (6), (b) (7)(C) was there to examine her first.

I helped to place riprap in the gaps around the fence and use the rebar the fasten the fence down.

On the day of the September 15, 2020 inspection I was working to clean and put new rock I the long barn. The staff and I would put up gates and close doors to keep the animals out on a temporary basis while we used the skid loader inside. At this time we were waiting for rock to be delivered.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 4299 U.S. Highway 150  
Paoli, IN 47454 6<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 18 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





CFR:3.127(d)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 18:46:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Gaps under the perimeter fence of the veld area 5-9 inches high. Coyotes getting in and killing balckbuck and fallow deer



CFR:3.127(d)

**Photographer:** AnnMarie Compton

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**Certificate:** 32-C-0265

**Legal Name:** WILSTEM INC

**Facility Name:** WILSTEM INC



CFR:3.127(d)

**Photographer:** AnnMarie Compton

**Date and Time:** Tue Sep 15 20:24:00 GMT 2020

**Inspection No:** 2016090000496308

**Description:** Gaps under the perimeter fence of the veld area 5-9 inches high. Coyotes getting in and killing balckbuck and fallow deer

**Certificate:** 32-C-0265

**Legal Name:** WILSTEM INC

**Facility Name:** WILSTEM INC





22-00957\_000166

<https://mail.google.com/mail/u/0/#inbox?projector=1>



**CAVE QUARRIES, INC.**  
QUALITY STONE & AG LIME

1156 N 425 W  
PAOLI, IN 47454-9686  
(812) 936-4923

REMIT TO: P.O. BOX 91  
JASPER, IN 47547-0091  
(812) 634-7115

INVOICE 169297

PAGE 1

DATE 9/26/20 12:00

ACCOUNT NO. W0117

SOLD TO WILSTEM FARMS  
P. O. BOX 88  
FRENCH LICK, IN 47432

Ticket	Date	PO	Order	Loc	Product	Qty	Material Rate Amount	Freight Rate Amount	Fee Amount	Tax Amount	Total
157531	09/22/20	1		2	#11A CRUSHED	0.94	12.40 11.66	0.00 0.00	0.00	0.82	12.48
Subtotal					#11A CRUE	0.94 Ton	11.66	0.00	0.00	0.82	12.48
158098	09/25/20	1		2	#11A CRUSHED	14.79	12.40 183.40	0.00 0.00	0.00	12.84	196.24
Subtotal					#11A CRUE	14.79 Ton	183.40	0.00	0.00	12.84	196.24
158122	09/25/20	1		2	#11B CRUSHED	9.36	10.10 94.54	0.00 0.00	0.00	6.62	101.16
Subtotal					#11B CRUE	9.36 Ton	94.54	0.00	0.00	6.62	101.16
157359	09/21/20	1		2	REVTMENT R	13.01	11.75 152.87	0.00 0.00	0.00	10.70	163.57
Subtotal					REVTMEI	13.01 Ton	152.87	0.00	0.00	10.70	163.57
Invoice Total						38.10 Ton	\$442.47	\$0.00	\$0.00	\$30.98	\$473.45

Total Invoice —> \$473.45

DEDUCT DISCOUNT AMOUNT IF PAID BY 15TH OF MONTH FOLLOWING —> 22.12

INVOICE DUE OCTOBER 15, 2020

WE APPRECIATE YOUR BUSINESS!

451.33

Company Name Wilstem  
Approved By (b) (6), (b) (7)(C)  
Date                       
Description maint grounds  
Account # 71250-10

MD 10/5/20

CAVE QUARRIES, INC.  
QUALITY STONE & AG LIME

1156 N 425 W  
PAOLI, IN 47454-9686  
(812) 936-4923

REMIT TO: P.O. BOX 91  
JASPER, IN 47547-0091  
(812) 634-7115

INVOICE 169741  
PAGE 1  
DATE 10/10/20 12:00

ACCOUNT NO. W0117

SOLD TO WILSTEM FARMS  
P. O. BOX 88  
FRENCH LICK, IN 47432

Ticket	Date	PO	Order	Loc	Product	Qty	Material Rate Amount	Freight Rate Amount	Fee Amount	Tax Amount	Total
160004	10/07/20	1		2	#53 CRUSHED	16.82	9.00 151.38	0.00 0.00	0.00	10.60	161.98
Subtotal					#53 CRUSHED	16.82 Ton	151.38	0.00	0.00	10.60	161.98
160221	10/08/20	1		2	REVETMENT R	13.91	11.75 163.44	0.00 0.00	0.00	11.44	174.88
Subtotal					REVETMENT R	13.91 Ton	163.44	0.00	0.00	11.44	174.88
Invoice Total						30.73 Ton	\$314.82	\$0.00	\$0.00	\$22.04	\$336.86

Total Invoice —> \$336.86  
DEDUCT DISCOUNT AMOUNT IF PAID BY 15TH OF MONTH FOLLOWING —> 15.74  
INVOICE DUE OCTOBER 30, 2020 <—  
WE APPRECIATE YOUR BUSINESS!  
\$321.12

Company Name Wilston  
Approved By (b) (6), (b) (7)(C)  
Date \_\_\_\_\_  
Description Maint grounds  
Account # 71350-10

MD 10/15/20



**CAVE QUARRIES, INC.**  
QUALITY STONE & AG LIME

1156 N 425 W  
PAOLI, IN 47454-9686  
(812) 936-4923

REMIT TO: P.O. BOX 91  
JASPER, IN 47547-0091  
(812) 634-7115

INVOICE 169923  
PAGE 1  
DATE 10/17/20 12:00

ACCOUNT NO. W0117

SOLD TO WILSTEM FARMS  
P. O. BOX 88  
FRENCH LICK, IN 47432

Ticket	Date	PO	Order	Loc	Product	Qty	Material Rate Amount	Freight Rate Amount	Fee Amount	Tax Amount	Total
160911	10/14/20	1		2	#53 CRUSHED	15.37	9.00 138.33	0.00 0.00	0.00	9.68	148.01
160925	10/14/20	1		2	#53 CRUSHED	17.80	9.00 160.20	0.00 0.00	0.00	11.21	171.41
160934	10/14/20	1		2	#53 CRUSHED	17.03	9.00 153.27	0.00 0.00	0.00	10.73	164.00
160937	10/14/20	1		2	#53 CRUSHED	17.48	9.00 157.32	0.00 0.00	0.00	11.01	168.33
Subtotal					#53 CRUSH	67.68 Ton	609.12	0.00	0.00	42.63	651.75
161139	10/15/20	1		2	REVTMENT R	14.25	11.75 167.44	0.00 0.00	0.00	11.72	179.16
Subtotal					REVTMEI	14.25 Ton	167.44	0.00	0.00	11.72	179.16
Invoice Total						81.93 Ton	\$776.56	\$0.00	\$0.00	\$54.35	\$830.91

Total Invoice —> \$830.91  
DEDUCT DISCOUNT AMOUNT IF PAID BY 15TH OF MONTH FOLLOWING —> 38.83  
INVOICE DUE NOVEMBER 6, 2020  
WE APPRECIATE YOUR BUSINESS! \$ 792.08

Company Name Wilstem  
Approved By (b) (6), (b) (7)(C)  
Date \_\_\_\_\_  
Description maint grounds  
Account # 71350-10

MD 10/23/20





**THE QUARRIES, INC.**  
QUALITY STONE & AG LIME

1156 N 425 W  
PAOLI, IN 47454-9686  
(812) 936-4923

REMIT TO: P.O. BOX 91  
JASPER, IN 47547-0091  
(812) 634-7115

INVOICE 170259  
PAGE 1  
DATE 10/31/20 12:00

ACCOUNT NO. W0117

SOLD TO WILSTEM FARMS  
P. O. BOX 88  
FRENCH LICK, IN 47432

Ticket	Date	PO	Order	Loc	Product	Qty	Material Rate	Amount	Freight Rate	Amount	Fee Amount	Tax Amount	Total
162354	10/26/20	1		2	#53 CRUSHED	10.98	9.00	98.82	0.00	0.00	0.00	6.92	105.74
Subtotal					#53 CRUSHED	10.98 Ton		98.82		0.00	0.00	6.92	105.74
162809	10/28/20	1		2	#53 CRUSHED	16.11	9.00	144.99	0.00	0.00	0.00	10.15	155.14
Subtotal					#53 CRUSHED	16.11 Ton		144.99		0.00	0.00	10.15	155.14
162821	10/28/20	1		2	REVTMENT R	13.70	11.75	160.98	0.00	0.00	0.00	11.27	172.25
Subtotal					REVTMENT R	13.70 Ton		160.98		0.00	0.00	11.27	172.25
Invoice Total						40.79 Ton		\$404.79		\$0.00	\$0.00	\$28.34	\$433.13

Total Invoice — > \$433.13  
DEDUCT DISCOUNT AMOUNT IF PAID BY 15TH OF MONTH FOLLOWING —> 20.24  
INVOICE DUE NOVEMBER 15, 2020  
WE APPRECIATE YOUR BUSINESS!  
412.89

Company Name Wilstem  
Approved By (b) (6), (b) (7)(C)  
Date 11/4/20  
Description repair grounds  
Account # 71350-10

need to return an item, our return policies are

*Wilhelm Drive Photo*

THANK YOU FOR SHOPPING AT RURAL KING  
#10 JASPER RURAL KING  
1920 LUBE WAY  
JASPER, IN 47546  
(812) 482-4840

09/17/20 8:19AM JVDGE10 266 SALE

29233046	1	EA	\$5.99	EA
HOWARD LEIGHT QUIET BAND				\$5.99
1327002	1	EA	\$3.99	EA
* 30" REBAR STAKE WITH LOOP				\$3.99
1327002	1	EA	\$3.99	EA
* 30" REBAR STAKE WITH LOOP				\$3.99
1327002	1	EA	\$3.99	EA
* 30" REBAR STAKE WITH LOOP				\$3.99
1327002	1	EA	\$3.99	EA
* 30" REBAR STAKE WITH LOOP				\$3.99
1327002	1	EA	\$3.99	EA
* 30" REBAR STAKE WITH LOOP				\$3.99
21400015	1	EA	\$4.99	EA S
PLANO .30CAL AMMO BOX				\$4.99
21400015	1	EA	\$4.99	EA S
PLANO .30CAL AMMO BOX				\$4.99
12591011	1	EA	\$8.99	EA
BLACK LOW PROFILE EAR MUFF				\$8.99
12591011	1	EA	\$8.99	EA
BLACK LOW PROFILE EAR MUFF				\$8.99
385006010	1	EA	\$9.99	L
MOULTRIE SMARTPHONE CARD READ				\$9.99
7020012	200	EA	\$3.19	EA
(O) 5' 1.25lb/ft				\$38.00

SUB-TOTAL:\$ 701.88 TAX: \$ 49.13  
TOTAL: \$ 751.01  
DC AMT: \$ 751.01

BK CARD#: XXXXXXXXXXXX0408  
MID:\*\*\*\*\*9889 TID:\*\*\*5063  
AUTH: 06579G AMT: \$ 751.01  
Host reference #:677090 Bat#

Authorizing Network: MASTERCARD

Chip Read  
CARD TYPE: MASTERCARD CVD0. VVXX  
AID: A001  
TVR: 800C  
JAD 0132

*animal other 04650-20  
main grounds 71350-10*



10/23/20



Springs Valley Supply  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

Credit Account #

212763

Springs Valley Supply Account #

9100

Invoice #

I10360999

#### Purchase Details

Invoice Date 09/17/2020  
Job Code WILSTEM RANCH  
PO # (b) (6), (b) (7)(C)  
Reference (b) (6), (b) (7)(C)  
Type Sale  
Authorization # 187304769  
Terms Standard

#### Purchase Location

Name Springs Valley Supply  
Address 799 S State Rd 145  
French Lick, IN 47432  
Phone (812) 936-4411

#### Ship To

Name WILSTEM RANCH  
Address P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$64.50	1.00	\$64.50
			Sub Total:	\$64.50
			Sales Tax:	\$4.52
			Invoice Total:	\$69.02

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.







Springs Valley Supply  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

**Credit Account #**

212763

**Springs Valley Supply Account #**

9100

**Invoice #**

I10361328

Purchase Details		Purchase Location	
Invoice Date	09/18/2020	Name	Springs Valley Supply
Job Code	WILSTEM RANCH	Address	799 S State Rd 145
PO #	DRIVE THRU		French Lick, IN 47432
Type	Sale	Phone	(812) 936-4411
Authorization #	187565215	<b>Ship To</b>	
Terms	Standard	Name	WILSTEM RANCH
		Address	P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$64.50	1.00	\$64.50
<b>Sub Total:</b>				\$64.50
<b>Sales Tax:</b>				\$4.52
<b>Invoice Total:</b>				\$69.02

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.





**Springs Valley Supply**  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

**Credit Account #**  
212763  
**Springs Valley Supply Account #**  
9100  
**Invoice #**  
I10361486

Purchase Details		Purchase Location	
Invoice Date	09/21/2020	Name	Springs Valley Supply
Job Code	WILSTEM RANCH	Address	799 S State Rd 145
PO #	DRIVE THRU		French Lick, IN 47432
Type	Sale	Phone	(812) 936-4411
Authorization #	187901541	<b>Ship To</b>	
Terms	Standard	Name	WILSTEM RANCH
		Address	P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$1.83	41.00	\$75.03
6134282	PIN03N024 REBAR PINS 3/8X24"	\$0.82	141.00	\$115.62
<b>Sub Total:</b>				\$190.65
<b>Sales Tax:</b>				\$13.35
<b>Invoice Total:</b>				\$204.00

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.





**Springs Valley Supply**  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

**Credit Account #**

212763

**Springs Valley Supply Account #**

9100

**Invoice #**

I10362099

---

**Purchase Details**

Invoice Date 09/24/2020  
Job Code WILSTEM RANCH  
PO # LIGHT SHOW  
Type Sale  
Authorization # 188445164  
Terms Standard

**Purchase Location**

Name Springs Valley Supply  
Address 799 S State Rd 145  
French Lick, IN 47432  
Phone (812) 936-4411

**Ship To**

Name WILSTEM RANCH  
Address P.O. BOX 88

---

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$1.29	84.00	\$108.36
<b>Sub Total:</b>				\$108.36
<b>Sales Tax:</b>				\$7.59
<b>Invoice Total:</b>				\$115.95

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.







**Springs Valley Supply**  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

**Credit Account #**

212763

**Springs Valley Supply Account #**

9100

**Invoice #**

I10363750

Purchase Details		Purchase Location	
Invoice Date	10/06/2020	Name	Springs Valley Supply
Job Code	WILSTEM RANCH	Address	799 S State Rd 145
PO #	MAINTENANCE		French Lick, IN 47432
Type	Sale	Phone	(812) 936-4411
Authorization #	190422369	Ship To	
Terms	Standard	Name	WILSTEM RANCH
		Address	P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
23708670	8442M NITRILE COATED GLOVE	\$5.05	1.00	\$5.05
33RS72	CHAIN 20" RS 3/8p .050g	\$28.90	1.00	\$28.90
4445037	LBSR-120 LITTLE BG SHOT NOZZLE	\$8.27	1.00	\$8.27
NEB-HLP-0011	MYCRO RC HEADLAMP RECHARGEABLE	\$18.39	2.00	\$36.78
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$1.29	145.00	\$187.05
Sub Total:				\$266.05
Sales Tax:				\$18.62
Invoice Total:				\$284.67

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.





**Springs Valley Supply**  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

**Credit Account #**  
212763  
**Springs Valley Supply Account #**  
9100  
**Invoice #**  
I10364299

Purchase Details		Purchase Location	
Invoice Date	10/10/2020	Name	Springs Valley Supply
Job Code	WILSTEM RANCH	Address	799 S State Rd 145
PO #	rebar		French Lick, IN 47432
Type	Sale	Phone	(812) 936-4411
Authorization #	191273737	<b>Ship To</b>	
Terms	Standard	Name	WILSTEM RANCH
		Address	P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$64.50	1.00	\$64.50
<b>Sub Total:</b>				\$64.50
<b>Sales Tax:</b>				\$4.52
<b>Invoice Total:</b>				\$69.02

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.





Springs Valley Supply  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

Credit Account #

212763

Springs Valley Supply Account #

9100

Invoice #

I10364524

#### Purchase Details

Invoice Date 10/12/2020  
Job Code WILSTEM RANCH  
PO # SAFARI  
Reference (b) (6), (b) (7)(C)  
Type Sale  
Authorization # 191435435  
Terms Standard

#### Purchase Location

Name Springs Valley Supply  
Address 799 S State Rd 145  
French Lick, IN 47432  
Phone (812) 936-4411

#### Ship To

Name WILSTEM RANCH  
Address P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
6134282	PIN03N024 REBAR PINS 3/8X24"	\$82.33	1.00	\$82.33
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$1.29	79.00	\$101.91
<b>Sub Total:</b>				<b>\$184.24</b>
<b>Sales Tax:</b>				<b>\$12.90</b>
<b>Invoice Total:</b>				<b>\$197.14</b>

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.







Springs Valley Supply  
Capital One Trade Credit  
PO BOX 105525  
ATLANTA, GA 30348-5525



(b) (6), (b) (7)(C)

Fuhs Properties  
550 W 36th St  
Jasper, IN 47546

Credit Account #  
212763  
Springs Valley Supply Account #  
9100  
Invoice #  
I10366660

Purchase Details		Purchase Location	
Invoice Date	10/29/2020	Name	Springs Valley Supply
Job Code	WILSTEM RANCH	Address	799 S State Rd 145
PO #	MAINT		French Lick, IN 47432
Type	Sale	Phone	(812) 936-4411
Authorization #	194146726	Ship To	
Terms	Standard	Name	WILSTEM RANCH
		Address	P.O. BOX 88

SKU	Description	\$/Unit	Units	Total
0999102	PIN04N024 REBAR PINS #4 1/2X24	\$1.29	100.00	\$129.00
Sub Total:				\$129.00
Sales Tax:				\$9.03
Invoice Total:				\$138.03

Pay online at <https://smartview.capitalone.com/go/springsvalley>  
Contact Capital One Trade Credit at (888) 321-6698 or [help@capitalonetradecredit.com](mailto:help@capitalonetradecredit.com) with questions.



amazon.com

## Final Details for Order #111-0736050-0999416

Print this page for your records.

**Order Placed:** April 26, 2021

**Amazon.com order number:** 111-0736050-0999416

**Order Total:** \$376.12

**Shipped on April 28, 2021**

### Items Ordered

2 of: Freeman FS9G2 9-Gauge 2" Glue Collated Barbed Fencing Staples (1000 count)

Sold by: Amazon.com Services LLC

Condition: New

**Price**

**\$87.88**

### Shipping Address:

wilster ranch  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
United States

\* Staples for fencing gun.

### Shipping Speed:

FREE Prime Delivery

**Shipped on April 28, 2021**

### Items Ordered

2 of: Freeman FS9G2 9-Gauge 2" Glue Collated Barbed Fencing Staples (1000 count)

Sold by: Amazon.com Services LLC

Condition: New

**Price**

**\$87.88**

### Shipping Address:

wilster ranch  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
United States

### Shipping Speed:

FREE Prime Delivery

## Payment information

### Payment Method:

MasterCard | Last digits: 6972

Item(s) Subtotal: \$351.52

Shipping & Handling: \$0.00

### Billing address

Wilster Wildlife Park  
4229 US 150  
Paoli, Indiana 47454  
United States

Total before tax: \$351.52

Estimated tax to be collected: \$24.60

**Grand Total: \$376.12**

### Credit Card transactions

22-00957\_000180

MasterCard ending in 6972: April 28, 2021: \$376.12



amazon.com

**Final Details for Order #111-1567757-9185021**Print this page for your records.**Order Placed:** April 26, 2021**Amazon.com order number:** 111-1567757-9185021**Order Total:** \$624.08**Shipped on April 29, 2021****Items Ordered**

1 of: *Freeman PFS9 Pneumatic 9-Gauge 2-Inch Ergonomic and Lightweight Fencing Stapler with Quick Release and Case, Orange (2 Pack)*  
Sold by: Spreetail ([seller profile](#))

**Price**

\$629.98

Condition: New

**Shipping Address:**

Wilstem ranch  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
United States

*\*To be used for fencing.***Shipping Speed:**

Expedited Shipping

**Payment information****Payment Method:**

MasterCard | Last digits: 6972

Item(s) Subtotal: \$629.98

Shipping &amp; Handling: \$0.00

Amazon Discount: -\$50.00

-----

Total before tax: \$579.98

Estimated tax to be collected: \$44.10

-----

**Grand Total: \$624.08****Billing address**

Wilstem Wildlife Park  
4229 US 150  
Paoli, Indiana 47454  
United States

**Credit Card transactions**

MasterCard ending in 6972: April 29, 2021: \$624.08

To view the status of your order, return to [Order Summary](#).[Conditions of Use](#) | [Privacy Notice](#) © 1996-2021, Amazon.com, Inc. or its affiliates



# SALES RECEIPT

SOLD FROM: (b) (6), (b) (7)(C)  
SOLD TO: Wilstem, Inc.

PAYMENT METHOD

CHECK NO.

JOB

QTY

ITEM #

DESCRIPTION

UNIT PRICE

LINE TOTAL

1

ATN X-Sight 4K Night  
Scope

\$1000

\$1000

RECEIPT # 101  
Date: 12/16/2020

THANK YOU  
FOR YOUR  
BUSINESS!

(b) (6), (b) (7)(C)

PAID IN FULL



amazon.com

Final Details for Order #112-0385091-2409030

Print this page for your records.

Order Placed: September 11, 2020

Amazon.com order number: 112-0385091-2409030

Order Total: \$26.74

Shipped on September 13, 2020

**Items Ordered****Price**1 of: Redneck Convent Versatile Snare Wire Trapping Supplies 12-Pack – Coyote Trap, \$24.99  
Fox Trap – Small Game Traps, Trapping Kit Snare Trap 12pkSold by: Autobodynow ([seller profile](#))

Condition: New

**Shipping Address:**

(b) (6), (b) (7)(C)

6561 W COUNTY ROAD 175 S  
FRENCH LICK, IN 47432-9201  
United States

\* Coyote snares

purchased 9/11/20

**Shipping Speed:**

FREE Prime Delivery

**Payment information****Payment Method:**

MasterCard | Last digits: 5381

Item(s) Subtotal: \$24.99

Shipping &amp; Handling: \$0.00

**Billing address**

(b) (6), (b) (7)(C)

wilstem inc  
550 w. 36th st  
jasper, In 47546  
United States

Total before tax: \$24.99

Estimated tax to be collected: \$1.75

**Grand Total: \$26.74****Credit Card transactions**

MasterCard ending in 5381: September 13, 2020: \$26.74

To view the status of your order, return to [Order Summary](#).[Conditions of Use](#) | [Privacy Notice](#) © 1996-2021, Amazon.com, Inc. or its affiliates



CFR:3.125(a)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 19:53:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** Broken wires on the perimeter fence of the kangaroo yard with the metal points facing in towards the kangaroos.





CFR:3.125(a)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 20:04:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** The kangaroo perimeter fence at 5ft high, wobbly and insecure in construction

# Patient History Report

**Client:** Guest Ranch, Wilstem (1428)  
**Phone:** (812) 936-4484  
**Address:** 550 W 36TH STREET  
 Jasper, IN 47546

**Patient:** Kangaroo (1428-42)  
**Species:** Other Small  
**Age:** 0 Yrs. 0 Mos.  
**Color:**

**Breed:** Other Small  
**Sex:** Undetermined

Date	Type	Staff	History
6/2/2020	B	(b) (6), (b) (7) (C)	1.00 Bile Acids-ANTECH (LO200) by (b) (6), (b) (7) (C)
6/2/2020	B	(b) (6), (b) (7) (C)	1.00 BAM SEDATION (MISC) by (b) (6), (b) (7) (C)
5/29/2020	B	(b) (6), (b) (7) (C)	1.00 Exam Large Animal Brief (LA290) by (b) (6), (b) (7) (C)
5/29/2020	B	(b) (6), (b) (7) (C)	1.00 LG ANIMAL CHEM W/ CBC L050 (MISC) by (b) (6), (b) (7) (C)
5/29/2020	B	(b) (6), (b) (7) (C)	1.00 TOXOPLASMOSIS GONDII PCR S18708 (MISC) by (b) (6), (b) (7) (C)
5/29/2020	B	(b) (6), (b) (7) (C)	1.00 FECAL - OVA AND PARASITE - ANTECH (1592) by (b) (6), (b) (7) (C)
5/21/2020	B	(b) (6), (b) (7) (C)	1.00 Health Certificate (BO330) by (b) (6), (b) (7) (C)
9/4/2019	B	(b) (6), (b) (7) (C)	1.00 FECAL - OVA AND PARASITE - ANTECH (1592) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 Examination-Normal Off Visit (PF350) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 IV CATHETER SETUP (IV101) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 FLUIDS-INFUSION PUMP (HO425) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 Fluids - IV First Liter (HO410) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 Glucose - SINGLE DRAW (LOL25) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 175 (MISC) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 X-Ray Film 14x17 First View (RA800) by (b) (6), (b) (7) (C)
4/23/2019	B	(b) (6), (b) (7) (C)	1.00 X-Ray Film 14x17 Additional (RA850) by (b) (6), (b) (7) (C)
4/18/2019	P	(b) (6), (b) (7) (C)	30.00 each of CLINDAMYCIN 150 MG EACH (OM362) Rx #: 132296 0 Of 0 Refills Filled by: (b) (6), (b) (7) (C) GIVE 1 CAPSULE BY MOUTH 3 TIMES DAILY UNTIL GONE
4/18/2019	B	(b) (6), (b) (7) (C)	30.00 each of CLINDAMYCIN 150 MG EACH (OM362) by (b) (6), (b) (7) (C)
12/14/2018	B	(b) (6), (b) (7) (C)	1.00 FECAL LARGE ANIMAL (LGFE) by (b) (6), (b) (7) (C)
4/2/2018	B	(b) (6), (b) (7) (C)	1.00 FECAL LARGE ANIMAL-NPS (LGFE)
7/1/2017	B	(b) (6), (b) (7) (C)	1.00 each of (FIN)
7/1/2017	B	(b) (6), (b) (7) (C)	1.00 VITAMINE B COMPLEX INJ (MISC)
7/1/2017	B	(b) (6), (b) (7) (C)	1.00 each of BAYTRIL INJ (IM200)
7/1/2017	B	(b) (6), (b) (7) (C)	1.00 Emergency farm call (LA351)
6/29/2017	B	(b) (6), (b) (7) (C)	1.00 FECAL LARGE ANIMAL-NO PARASITE (LGFE)

B: Billing, C: Med note, CB: Call back, CK: Check-in, CM: Communications, D: Diagnosis, DH: Declined to history, E: Examination, ES: Estimates,  
 I: Departing instr, L: Lab result, M: Image cases, P: Prescription, PA: PVL Accepted, PB: problems, PP: PVL Performed, PR: PVL Recommended,  
 R: Correspondence, T: Images, TC: Tentative medl note, V: Vital signs



## Patient History Report

**Client:** Guest Ranch, Wilster (1428)  
**Phone:** (812) 936-4484  
**Address:** 550 W 36TH STREET  
Jasper, IN 47546

**Patient:** PERTH (6723)  
**Species:** Other Large  
**Age:** 0 Yrs. 0 Mos.  
**Color:** RUST

**Breed:** Kangaroo  
**Sex:** Male

Date	Type	Staff	History
------	------	-------	---------

8/24/2020	C	[REDACTED]	NECROPSY RESULTS - FINAL 08/24/2020
-----------	---	------------	-------------------------------------

I performed a necropsy on Perth, an approximately 11 year old male kangaroo on 08-10-2020. There were no gross lesions in the thorax or abdomen. The lungs, liver, spleen, and heart were all within normal limits. No abnormalities were detected in the intestinal tract. The brain and spinal cord were not grossly examined. With history of chronic weight loss, no oral lesions or teeth abnormalities and acute onset of neurologic disease with circling. I believe the animal suffered from a spinal or brainstem mass.

8/10/2020	B	[REDACTED]	4.00 [None] of 3 CC DART (1884) by [REDACTED]
8/10/2020	B	[REDACTED]	1.00 [None] of BAM KIT (1885) by [REDACTED]
8/10/2020	B	[REDACTED]	1.00 Necropsy Large Animal (LA470) by [REDACTED]

B: Billing, C: Med note, CB: Call back, CK: Check-in, CM: Communications, D: Diagnosis, DH: Declined to history, E: Examination, ES: Estimates, I: Departing instr, L: Lab result, M: Image cases, P: Prescription, PA: PVL Accepted, PB: problems, PP: PVL Performed, PR: PVL Recommended, R: Correspondence, T: Images, TC: Tentative med note, V: Vital signs





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 889 N. Gospel Street, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. Mailing address P.O. Box 88, French Lick, IN 47432. My email address (b) (6), (b) (7)(C)

I worked for Wilstem from April 2018 until December 2018. I was laid off due to family care issues. I returned to work for Wilstem from March 2019 through September 2020. During COVID, I resided on Wilstem property. I worked in the office prior to being laid off; upon my return, I worked in the "barn", which included husbandry, care, animal encounters, zip line, ATV tours, and any other animal related duties (sometimes even office duties). When (b) (6), (b) (7)(C) left for a leave of absent, I became the manager. (b) (6), (b) (7)(C) then returned to work and Jerry Fuhs announced to him that I was now his supervisor.

Regarding the Elands, it was my job, along with (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) to lock up in the evening. (b) (6), (b) (7)(C) were previously employed with a circus. Jerry Fuhs and I were the only people who knew how to feed the Elands. Around May 2020, when I came to work in the morning, there was a bucket of feed sitting by the Eland enclosure. (b) (6), (b) (7)(C) noticed the Eland was not in the enclosure. One was found by the creek. She was tranquilized and returned to her barn. I put a sheet over her head, and she was transported back to her enclosure. I was told to stay with her, and she should be awake in 20-40 min. She did not awaken for at least 45-50 minutes.

The staff members herded the other two Eland into a fenced in inclosure. The second Eland ran into a post and broke her neck. At approximately the same time (b) (6), (b) (7)(C) arrived. Then the 3<sup>rd</sup> Eland, a male, was darted and returned to the enclosure. (b) (6), (b) (7)(C) left at this point. It took the male an hour or so to awaken. I continued to monitor the remaining Elands approximately every 2 hours for the rest of the day.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 889 N. Gospel Street, Paoli, IN 47454 on this 27<sup>th</sup> day of April 2021.

735 N. Gospel St.

OB  
AB

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS. AUTHORITY NO 3615.



## AFFIDAVIT

I (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

The Giraffe Encounter remained un-supervised while I was there, which was due to lack of staffing. We were doing 5-minute encounters per species. Most were unsupervised.

"Perth", the kangaroo, escaped and was loose for approximately four days. Finally, (b) (6), (b) (7)(C) shot the kangaroo. I had concerns about Perth because he was not breeding, losing weight, and pacing in the enclosure. Perth had been seen by the veterinarian but was not under a plan or other care.

I had no formal training with exotic animals. I grew up with farm animals. (b) (6), (b) (7)(C) and I requested training for me and the other staff. Jerry Fuhs did not provide us any opportunities. I learned from a previous employee as much as I could before she left by shadowing her. I then started doing my own online research for specific animals, which is how I educated myself.

On March 2020, I went into the lemur enclosure, as I typically did, to train and feed them. The male lemur attacked me because it apparently wanted the bananas. It attacked me with its left hand missing my face but knocking my glasses off. When I leaned to retrieve my glasses, it ran off with the bananas. I reported this incident to Jerry Fuhs and (b) (6), (b) (7)(C) because I knew that lemurs could cause serious damage from a bite and/or scratches. I did not make a formal report.

Around Fall 2019, while I was at the barn, (b) (6), (b) (7)(C) former employee), used an earthmover to crush the head of a llama, which was not as the veterinarian had prescribed euthanasia.

Around end of March 2020, the donkey name Daisy, which had severely overgrown hooves, injured her hind leg (b) (6), (b) (7)(C) phone consulted with (b) (6), (b) (7)(C) who said that if the leg was broken, then it could not be repaired. I gave Daisy bute, pain medication. The following day, I noticed that she had a compound leg break because the bone was sticking out of her skin. She was limping and there was bleeding. We contacted (b) (6), (b) (7)(C) and he arrived within 15 or so minutes. He euthanized her. It took a few hours before she was buried.

I have had an opportunity to review and read my statement. It is true and correct to the best of

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 885 N. Gospel Street, Paoli, IN 47454 on this 27<sup>th</sup> day of April 2021.

735  
AB

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.



AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement  
my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 735 889 N. Gospel Street, Paoli, IN 47454 on this 3<sup>rd</sup> day of April 2021.

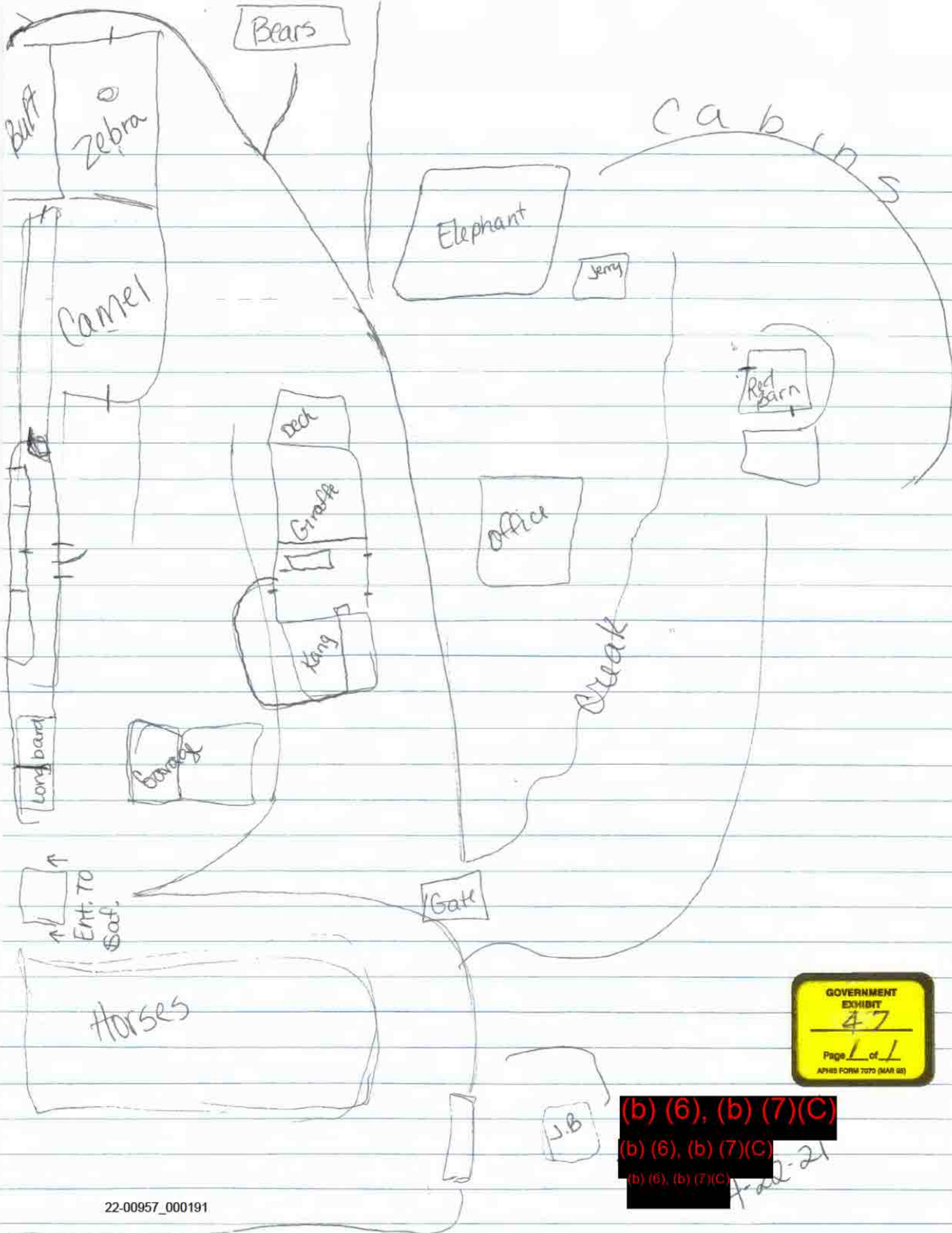
AB

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.







GOVERNMENT  
EXHIBIT  
47  
Page 1 of 1  
APHIS FORM 7070 (MAR 95)

(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)  
(b) (6), (b) (7)(C)  
-21

**ANTECH**

800-872-1001

Orange County Animal Clinic  
ANTECH Acct No. 32747

Accession No. CHAV00167121

Received 05/30/2020

Reported 06/05/2020 12:05 PM

Doctor (b) (6), (b) (7)(C)

Owner	Pet Name	Species	Breed	Sex	Pet Age	Chart#
WILSTEM GUEST	KANGAROO	Marsupial		N/A	N/A	N

**Complete Blood Count**

Tests	Results	Ref. Range	Units
WBC	4.4	4.1-10.3	10 <sup>3</sup> /μL
RBC	4.1	3.3-5.9	10 <sup>6</sup> /μL
HGB	14.2		g/dL
HCT	41	40-50	%
MCV	101		fL
MCH	34.5		pg
MCHC	34		g/dL
Poikilocytosis			
Target Cells Slight			
NRBC	1		/100
WBC			
Blood Parasites	None Seen		
Platelet Count	211		10 <sup>3</sup> /μL
Platelet count reflects the minimum number due to platelet clumping.			
Platelet Estimate	Adequate		
<b>Differential</b>	<b>Absolute</b>	<b>%</b>	
Neutrophils	2904	66	/μL
Bands		0	
Lymphocytes	1364	31	/μL
Monocytes	88	2	/μL
Eosinophils	44	1	/μL
Basophils	0	0	/μL
Comment			
Blood smear reviewed by technologist.			

Test Requested	Results	Reference Range	Units
<b>LARGE ANIMAL CHEMISTRY</b>			
Total Protein	5.4 (LOW)	5.6-8.0	g/dL
Albumin	3.5 (HIGH)	2.0-3.0	g/dL
Globulin	1.9 (LOW)	3.0-4.0	g/dL
A/G Ratio	1.8 (HIGH)	0.5-1.0	
AST (SGOT)	56	0-150	IU/L
Alk Phosphatase	231 (HIGH)	13-35	IU/L
GGT	3		IU/L
Total Bilirubin	0.1 (LOW)	0.3-0.6	mg/dL
D. BILIRUBIN	0.0		mg/dL
BUN	33	20-40	mg/dL
Creatinine	1.9	1.0-2.0	mg/dL
BUN/Creatinine Ratio	17	10-40	
Phosphorus	7.8	4.6-8.2	mg/dL
Glucose	223 (HIGH)	80-100	mg/dL
Calcium	9.5	8.0-11.0	mg/dL
Sodium	142 (LOW)	143-155	mEq/L
Potassium	4.8	4.1-6.1	mEq/L
NA/K Ratio	30		
Chloride	100	100-108	mEq/L
Cholesterol	50 (LOW)	80-151	mg/dL
CPK	228	0.0-1000	IU/L
LDH	59		IU/L
<b>OVA AND PARASITE</b>			
Ova & Parasite	NONE SEEN		
<b>TOXOPLASMA GONDII PCR</b>			
TOXO PCR	NOT DETECTED		

Page 1

FINAL

For online lab results please visit [online.antechdiagnostics.com](http://online.antechdiagnostics.com)

Accession No. CHAV00167121      Doctor (b) (6), (b) (7)(C)      Owner WILSTEM GU      Pet Name KANGAROO

Test Requested	Results	Reference Range	Units
----------------	---------	-----------------	-------

This is an updated and/or corrected result(s).  
Test performed at COLORADO STATE UNIVERSITY

## REPORT NOTES:

\*\*\*\*\*  
In order for us to efficiently and accurately process your fecal specimen, it is critical that they are submitted in the proper container. Using non-standard containers (bags, fecalizers), barcode labels do not affix properly and presents a problem when processing and setting up the sample.

Please contact Customer Service to order fecal containers that will allow us to accurately maintain positive identification and efficiently process the specimen.

Thank you.  
\*\*\*\*\*







889 NORTH GOSPEL ST STE 1  
PAOLI, IN 47454  
812-723-0054

Ticket: 369982

Date: 9/16/20

Time: 3:04 PM

Store: 1526

Register: 2

Cashier: Elizabeth

Business Customer: WILSTEM INC.  
4229 W US HIGHWAY 150  
PAOLI, IN 47454-9685  
812-634-1413

Company Name

Approved By

Date

Description

Account #

Item	Qty	Price	Amount
32 GALLON BRUTE CONTAINER WITH LID 1076658	1	32.99	32.99

32 GALLON BRUTE CONTAINER WITH LID 1076658	1	32.99	32.99
---	---	-------	-------

PERMETHRIN 10% 32OZ 2212611	1	17.99	17.99
--------------------------------	---	-------	-------

DMR GAL PLATINUM EQUINE FLY SPRAY 1336643	1	39.99	39.99
--	---	-------	-------

WIRE 14G 1/4MILE FENCE 3601091	1	22.99	22.99
-----------------------------------	---	-------	-------

NH S&D 128OZ POUR 1264564	1	26.99	26.99
------------------------------	---	-------	-------

NH URINE DESTROYER 128OZ POUR 1264561	1	35.99	35.99
--	---	-------	-------

Subtotal	209.93
Tax	14.70
Total	224.63

TSC Business Account - SALE 224.63  
\*\*\*\*\*5430 - Undefined  
Authorization #: 016952  
Terminal ID : 001791526000200  
CVM : DEFAULT  
PO #: 0916

Change 0.00

Taxes to be paid by customer

trash removal  
75400-10

other

pest control  
71700-10

maint grounds 71350-10

animal other  
64450-20

\* Kangaroo  
fencing



22-00957\_000196







22-00957\_000196







CFR:2.131(d)(2)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 20:12:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** A young child climbed onto a fence to pet a camel during the inspection with no attendant at the public feeding encounter. It took 10 mins for an keeper to arrive at the public feeding area. A second family showed up with 2 young children feeding the camel with no keeper at the feeding area.



CFR:2.131(d)(2)

**Photographer:** AnnMarie Compton

**Certificate:** 32-C-0265

**Date and Time:** Tue Sep 15 20:12:00 GMT 2020

**Legal Name:** WILSTEM INC

**Inspection No:** 2016090000496308

**Facility Name:** WILSTEM INC

**Description:** A young child climbed onto a fence to pet a camel during the inspection with no attendant at the public feeding encounter. It took 10 mins for an keeper to arrive at the public feeding area. A second family showed up with 2 young children feeding the camel with no keeper at the feeding area.

# DAILY SCHEDULE

Date: Staff: (b) (6), (b) (7)(C)  
Elephant Hay Delivery:

START TIME	ENCOUNTER/ACTIVITY	STAFF	START TIME	ENCOUNTER/ACTIVITY	STAFF
9:00-4:00	Drive Thru Gate	(b) (6), (b) (7)(C)	11:30	Grizzly	(b) (6), (b) (7)(C)
9:00-4:00	Drive Thru Ranger/Floater		11:30	Giraffe	
9:00-4:00	Drive Thru Camels		12:30	Drive Thru Wagon	
9:00-4:00	Drive Thru Directional		1:00	Private Giraffe	
9:00-5:00	Roos Barn Carrot Sales	(b) (6), (b) (7)(C)	1:00	Elephant Manure Pickup *Once a week on MON OR TUES	
8:45	Rise & Shine Elephant		1:30	Horse	(b) (6), (b) (7)(C)
8:45	VIP Grizzly	(b) (6), (b) (7)(C)	1:30	ATV	
9:00 9:30	All Access 9-10:30 Barn + Encounters		1:30	Grizzly	
9:00	ATV units 3		2:00	Drive Thru Wagon	
9:00	Horse 4		2:30	Elephant Spa	
9:30	Elephant Spa		2:30	Giraffe	(b) (6), (b) (7)(C)
10:00	Sloth 3	(b) (6), (b) (7)(C)	3:00	Zipline	
10:30	Drive Thru Wagon		3:30	Elephant Educational	
10:30	Elephant Educational		3:30	Grizzly	(b) (6), (b) (7)(C)
10:30	Zipline 12	(b) (6), (b) (7)(C)	4:30	Sloth	

Notes: Lunch: 11:00 (b) (6), (b) (7)(C)

PM Barn Closes - (b) (6), (b) (7)(C)

PM Trash - (b) (6), (b) (7)(C)

1600-1200 - (b) (6), (b) (7)(C)

break per.



Species: Eland Antelope ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Bovine Optimer Paste	1 <sup>st</sup>	few days of birth			
Clostridium Type A					
Parasubacterium		d no rt age			
Pasteurella Multocida		Bovine 21 d			
E coli		Adults annually			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually  
Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: Fenbendazole 10 mg/kg Dronectin half dose of BW topically as determined by fecal  
How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

Attending Veterinarian: (b) (6), (b) (7)(C) Date: 10-12-20

Species: Nilgai Antelope ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Bovine Optimer Paste w/ 1 <sup>st</sup> few days of birth					
Chlorobacter Type A 2m Booster					
Fusobacterium					
Chlorobacter Mulbridge					
E. coli		Annually			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: Benbendazole 10 mg/kg PO Ivermectin 1 mg/kg of BW topically How many times a day: as determined by fecal

How many days: \_\_\_\_\_

Attending Veterinarian: **(b) (6), (b) (7)(C)** Date: 10-12-20

Species: Dryx Antelope ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Bone Optimizer Paste	w/in 1 <sup>st</sup> few days after birth				
Clostridium Type A					
Phorbacterium	2mo then 2nd booster then annually				
Pasteurella Multocida					
E. coli					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: Anthelmintic 10-15% PO Presentation (pour-on, Oral, Injectable, etc.): Determined by fecal  
Frontech 1ml (22<sup>nd</sup> of BW Topically

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

(b) (6), (b) (7)(C)

Attending Veterinarian: \_\_\_\_\_ Date: 10-12-20



Species: A. budae ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Chloridial Potting</u>	<u>3 weeks of age booster</u>				
<u>Type C + D Tetanus</u>	<u>2x</u>	<u>Annual</u>			
<u>Barvac CID + TE</u>					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 1 ml / 100 # BW SQ How many times a day: \_\_\_\_\_

How many days: One treatment

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 3-4x a year

Medication: Fenbendazole 1ml/25# of BW Presentation (pour-on, Oral, Injectable, etc.): Oral  
Ivermectin 1ml/11# of BW

Doses: \_\_\_\_\_ How many times a day: Depending on fecal

How many days: One

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-18-20

Species: Bison Bovine ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Clostridial 8 way	done	Booster			
Cattleman's 5 <sup>12</sup> 1st		aid			
Cattleman's 5 <sup>12</sup> 2nd	11				
Perf, Repro, diarrhea		Annual			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray  
Doses: \_\_\_\_\_ How many times a day: As needed  
How many days: \_\_\_\_\_ During fly season

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 22 years  
Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: 1ml / 22 lb of Body Weight How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Water Buffalo ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Clostr. dual Survey	2mo	Booster in 21 days then annually			
CattleMaster 500	2mo	Booster in 21 days then annually			
CattleMaster 500S		Annually			
Resq, diarrhoea, Resp					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: Gleech® Presentation (pour-on, Oral, Injectable, etc.): Drench Pour-on

Doses: 1 mL / 22# of BW How many times a day: Determined by fecal egg count

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20



Species: Watusi Cattle Borne ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Charaderial 8 way	2 mo / Booster				
Cattle mastitis 5 @ 100 mg / 100 mg	" 2nd				
Coccidiosis 5 mg @		Annual			
Reg. Reprod. diseases					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: As needed during fly season

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 2x a year

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 1 ml / 22 lb of BW How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20

Species: Barn ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Ascaridial Worm</u>	<u>2nd Booster</u>				
<u>Cattlenaster 501</u>	<u>1st</u>				
<u>Resp. disease</u>		<u>Annual</u>			
<u>Cattlenaster 501</u>					
<u>Resp. Resp. disease</u>					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: As needed during Fly Season

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 2x a year

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 1cc / 22 lb of BW How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-10-20

Species: Bovine ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Clostridial Sway	2mo / Booster 21 d				
Cattlewaster <sup>Resp</sup> <del>diarrhea</del>	2mo / (Booster) 1d				
Cattlewaster <sup>Resp</sup> <del>diarrhea</del>		Annual			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray  
Doses: \_\_\_\_\_ How many times a day: as needed during fly season  
How many days: As needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 2x a year  
Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: 1 ml / 22 lb of BW How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20



Species: Goats (Caprine) ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Clostridium Perfringens</u>	<u>3 weeks of age with</u>	<u>Annual</u>			
<u>Type C + D</u>	<u>age with</u>	<u>booster in</u>			
<u>Tetanus Toxoid</u>	<u>21 d</u>				
<u>(Barvac C/D + T®)</u>					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): injectable  
Doses: 1 ml / 100 # of BW How many times a day: \_\_\_\_\_  
How many days: one time treatment - as needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 3-4 times a year  
Medication: Fenbendazole Presentation (pour-on, Oral, Injectable, etc.): Oral  
Ivermectin 2ml / 11 # of Body weight  
Doses: Fenbendazole 2ml / 25 # BW How many times a day: Depending on fecal results  
How many days: one

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20

Species: Nubian Goats ID: \_\_\_\_\_  
Caprine

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Clostridium perfringens</u>	<u>3 weeks of</u>				
<u>Type C &amp; D + Tetanus</u>	<u>Age - 8 wks</u>				
<u>Bovine C/D + T</u>	<u>21 d</u>	<u>Annual</u>			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): injectable

Doses: 1 ml / 100 # BW SQ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 3-4 x a year

Medication: Fenbendazole 2ml / 25 # of BW Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Dormectin 2ml / 11 # of BW  
Doses: \_\_\_\_\_ How many times a day: Depending on fecal results

How many days: One

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Cavy ID: \_\_\_\_\_

Check if N/A ☒

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
approximately 0.1 cc / 10<sup>4</sup> of BW SQ  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually  
Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: Deworm determined  
by fecal  
How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20



Species: Camel ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Cl. stridum Perfringer</u>	<u>2 months</u>	<u>+ Booster in 21 d</u>			
<u>C/D + Tetanus</u>					
<u>Bovine C/D + Tetanus</u>		<u>Annually</u>			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: Fenbendazole 2mg / 20 # of BW orally  
Ivermectin 2mg / 11 # of BW orally How many times a day: Determined by fecal

How many days: \_\_\_\_\_

Attending Veterinarian: (b) (6), (b) (7)(C) Date: 10-12-20

Species: Black Buck ID: \_\_\_\_\_  
Cervidae

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Barne Optimizer Paste	when 1st few days after birth				
Clostridium Type A		Annually			
Fusobacterium		↓			
Pasteurella Multocida					
E. coli					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topical, as needed during fly season

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: Fenbendazole 10mg/kg PO  
Ivermectin 1ml/22# BW topically Determined by fecal  
How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Fallow deer ID: \_\_\_\_\_  
Cervidae

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Barne Optimizer Paste	1st	few days	after birth		
Clostridium Type A		Annually			
Pyogobacterium					
Pasteurella multocida					
E. coli					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed during fly season  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually  
Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: Fenbendazole 10mg/kg Po  
1hr before 1hr after of BW topically as determined by fecal  
How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

(b) (6), (b) (7)(C)

Attending Veterinarian: \_\_\_\_\_ Date: 10-12-20



Species: Donkey (Equine) ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Eastern/Western Encephalitis	4mo of age	Baster 21d then annually			
Tetanus Toxoid	"	"		"	
West Nile	"	"		"	
Rabies	4mo of age then annually				

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Spray Presentation (pour-on, Oral, Injectable, etc.): Spray

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: As needed during fly season

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: Praxecton 200mg 11kg  
Fenbendazole 10g/kg How many times a day: Determined by fecal

How many days: One

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Min Donkey ID: \_\_\_\_\_  
Equine

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Eastern/Western Encephalitis	Amos	- Booster in 21 d	Then annually		
Tetanus Toxoid	"		"	"	
West Nile	"		"	"	
Rabies	Amos	of age	Then annually		

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Spray Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: As needed during fly season

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: Ivermectin 200 mcg/kg  
Fenbendazole 100 mg/kg How many times a day: Determined by fecal

How many days: One egg count

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Giraffe ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Polio	4 months	annual			
Tetanus Toxoid	4-8 weeks	every 2 yrs			
Clostridium (Black leg)	4-8 weeks Repeat 3 weeks	Not needed after 2 years			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Topical  
Doses: Topical Spray as needed for lice & flies How many times a day: as needed in summer months  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Semiannual unless clinical signs of diarrhea  
Medication: Fenbendazole Presentation (pour-on, Oral, Injectable, etc.): Oral  
Doses: 5mg/kg How many times a day: once a day for 3-5 days  
How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

Date: \_\_\_\_\_



Species: Hedgehog ID: \_\_\_\_\_

Check if N/A ☒

A. VACCINATIONS – SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT

B. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 200 mcg/kg = 0.1 mL/10<sup>kg</sup> How many times a day: \_\_\_\_\_

How many days: 1 Treatment SQ

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☐ NO ☒ How often: \_\_\_\_\_

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Kangaroo ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Rabies	3 months	1 yr	Repeat every 2 years		
Tetanus Toxoid	3 months	1 yr	Repeat every 2 years		

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Frontline (R) Presentation (pour-on, Oral, Injectable, etc.): Topical

Doses: Topical as needed How many times a day: \_\_\_\_\_  
for fleas, mites

How many days: Monthly Treatment if needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Twice a year

Medication: Albendazole Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: 3 mg/kg How many times a day: Once a day  
Albendazole 10 mg/kg

How many days: 3

(b) (6), (b) (7)(C)

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20

Species: Kangaroo ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Rabies	3 months	1 yr	Repeat every 2 years		
Tetanus Toxoid	3 months	1 yr	Repeat every 2 years		

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Frontline (R) Presentation (pour-on, Oral, Injectable, etc.): Topical

Doses: Topical as needed How many times a day: \_\_\_\_\_  
for fleas, mites

How many days: Monthly Treatment if needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Twice a year

Medication: Albendazole Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: 3 mg/kg How many times a day: Once a day

How many days: 3

Attending Veterinarian: \_\_\_\_\_ Date: \_\_\_\_\_



Species: Llamas + Alpacas ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Clostridium Perfringens</u>	<u>2 weeks</u>	<u>Annual</u>			
<u>Type C/D</u>	<u>or age</u>	<u>Vaccination</u>			
<u>Tetanus Toxoid</u>	<u>with 3 week</u>				
<u>Booster C/D + T (P)</u>	<u>Booster</u>				

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray

Doses: Topical Spray How many times a day: as needed

How many days: May be daily

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 4 times a year

Medication: Cydekin® Moxidectin Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: 1ml / 100 lb of BW How many times a day: Treat one time

How many days: Treat one day Repeat depending on fecal

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Lemurs ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Tetanus Toxoid	3, 6, 9 months	3 years			
Rabies	4 mo	1 yr then every 3 years			

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Topical pyrethroids or Fipronil Presentation (pour-on, Oral, Injectable, etc.): Pour on / spray  
Doses: Standard dose according to weight  
Doses: Topical as needed How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually  
Medication: Fenbendazole Presentation (pour-on, Oral, Injectable, etc.): Oral  
Doses: 50 mg/kg How many times a day: as needed per fecal  
How many days: 3 days

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Sheep (Ovine) ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Clostridial Perfringens	3 weeks of age	Annual			
Type C/D	age - booster				
W Tetanus Toxoid	in 21 days				
Barvac C/D+T @					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 1 ml / 100<sup>th</sup> of BW SQ How many times a day: \_\_\_\_\_

How many days: One time treatment as needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 3-4 x a year

Medication: Fenbendazole Presentation (pour-on, Oral, Injectable, etc.): Oral

Fenbendazole Ivermectin 1 ml / 11<sup>th</sup> of Body weight  
Doses: 2 ml / 25<sup>th</sup> of Body weight How many times a day: Depending on fecal

How many days: One

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20



Species: Peromyscus ID: \_\_\_\_\_

Check if N/A ☒

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 200 mcg/kg = 0.1 ml / 10<sup>4</sup> g BW How many times a day: \_\_\_\_\_

How many days: 1 Treatment SR

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☐ NO ☒ How often: \_\_\_\_\_

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20

Species: Sloth ID: \_\_\_\_\_

Check if N/A ☒

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Presentation (pour-on, Oral, Injectable, etc.): Topically as needed for fly control

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
annually

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

Species: Wallaby ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
<u>Rabies</u>	<u>3 months</u>	<u>1 yr</u>	<u>Repeat every 2 years</u>		
<u>Tetanus Toxoid</u>	<u>3 months</u>	<u>1 yr</u>	<u>Repeat every 2 years</u>		

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Prethor Presentation (pour-on, Oral, Injectable, etc.): Topical

Doses: Topical monthly treatment How many times a day: \_\_\_\_\_  
as needed for fleas, mites

How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually

Medication: Albendazole Presentation (pour-on, Oral, Injectable, etc.): Oral

Doses: 3 mg/kg  
Fenbendazole 10-g/kg How many times a day: 1

How many days: 3

Attending Veterinarian: \_\_\_\_\_

(b) (6), (b) (7)(C)

Date: 10-12-20



Species: Zebras ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
Eastern/Western Encephalitis	4 mos	- booster	21 d	then annually	
Tetanus Toxoid	"		"	"	
West Nile Virus	"		"	"	
Rabies	first of age		then	annually	

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Permethrin Spray Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: As needed during fly season  
How many days: \_\_\_\_\_

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☒

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_  
How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: Biannually  
Medication: Ivermectin 200 mcg/kg Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_  
Doses: Fenbendazole 1 mg/kg How many times a day: Determined by fecal egg count  
How many days: One

Attending Veterinarian: \_\_\_\_\_

Date: 10-12-20

Species: Zebus/Highlander ID: \_\_\_\_\_

Check if N/A ☐

A. VACCINATIONS - SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

	JUVENILE	ADULT		JUVENILE	ADULT
- Clostridial - 8 way	2mo / Booster 21d	Annual up to 4 yrs			
- Cattle master 5+LS	2mo / Booster 21d	Annual			
- Resp / diarrhoea / Repro					

B. PARASITE CONTROL PROGRAM - DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

Medication: Pyrethrin Presentation (pour-on, Oral, Injectable, etc.): Spray

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: As needed

2. BLOOD PARASITES (Heartworm, Babesia, Ehrlichia, Other): Check if N/A ☐

Medication: \_\_\_\_\_ Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: \_\_\_\_\_ How many times a day: \_\_\_\_\_

How many days: \_\_\_\_\_

3. INTESTINAL PARASITES (Fecals, Deworming):

Fecal Test: Yes ☒ NO ☐ How often: 2x a year

Medication: Ivermectin Presentation (pour-on, Oral, Injectable, etc.): \_\_\_\_\_

Doses: 1 mL / 22 lb of BW How many times a day: 2x a year

How many days: \_\_\_\_\_

Attending Veterinarian

(b) (6), (b) (7)(C)

Date: 10-12-20

## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 7040 N. St. Rd 337, Orleans, IN 47452. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. Mailing address P.O. Box 88, French Lick, IN 47432. My phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C)

I worked for Wilstem from approximately 2013 until May 2019. I was hired as a zipline guide. After approximately 3 years I was promoted to head of the zipline/outdoor recreation division of Wilstem Inc. It was around this time Jerry Fuhs was beginning the animal park. I have no experience in the animal or zookeeping industry, but I was a trusted member of the Wilstem, Inc. team. I always treated my job and the owners of Wilstem, Inc with respect. For this reason, I was given the opportunity to be (b) (6), (b) (7)(C) of Wilstem, Inc.

My duties as (b) (6), (b) (7)(C) regarding the animal park, were making sure the barns were properly staffed and cleaned, and that the giraffe and kangaroo encounters were adequately staffed. Anything that had to do with the cleaning, feeding and encounter protocols went through me. (b) (6), (b) (7)(C) Jerry Fuhs, and I had access to the USDA paperwork that had to be maintained. I kept record of new arrivals as well as any deaths. I was shown how to complete the USDA paperwork by Jerry Fuhs.

During the time I worked for Wilstem, Inc. we received 2 kangaroos, 2 or 3 donkeys, 2 or 3 alpacas and 3 or 4 llamas from a Ringling Brothers shutdown park. All the animals seemed healthy when we received them. However, after a few months, a male kangaroo, named "Perth", suddenly died. Staff reported that he reached up in the air and fell over dead. Jerry Fuhs told me not to record this death, as we were receiving another male kangaroo to replace this one and he was to be named "Perth" as well. To my knowledge neither the death nor the replacement was ever recorded in the paperwork.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 7040 N. St Rd 337, Orleans, IN 47452, on this 5<sup>th</sup> day of May 2021

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 18 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





**AFFIDAVIT**

I, **(b) (6), (b) (7)(C)** being duly sworn on oath make the following statement

I am unclear as to some of the details regarding a young kangaroo named "Lizzy". She was being bottle fed by the staff and by some of the visitors to Wilstem, Inc. I recall she became ill and died. A necropsy was performed and determined she died due to a lung infection from the aspiration of milk. I do not remember if this death was recorded in the USDA paperwork or if another animal was brought in as a new "Lizzy".

I left Wilstem, Inc. prior to the opening of the drive through portion of the park. My retention of my position was at the mercy of the park ownership and everything always ran the way Jerry Fuhs wanted. I did my job the way I was told, and I left before many of the other alleged events took place.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

**(b) (6), (b) (7)(C)**  
\_\_\_\_\_  
SIGNATURE OF AFFIANT

Subscribed and sworn to before me at 7040 N. St Rd 337, Orleans, IN 47452, on this 5<sup>th</sup> day of May 2021



**(b) (6), (b) (7)(C)**  
DESIGNATED PURSUANT TO 1 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.

Wisdom Wildlife Park



USDA

Paperwork &  
Information

# PROGRAM OF VETERINARY CARE INSTRUCTIONS

\*The enclosed Program of Veterinary Care (PVC) should be completed and signed by your attending veterinarian and must be signed by you.

\*Keep the properly completed PVC as part of your records that will be reviewed by your USDA inspector.

\*DO NOT send the completed PVC form to this office.

\*You need a new PVC form only if you change your attending veterinarian.

\*You need to update your PVC form and have it re-signed by your attending veterinarian any time you add a new species of animal to your facility or make any other changes in the veterinary care you are providing.

\*This sheet may be used as a means to document your attending veterinarian's visit to your facility. If you choose to use it for that purpose, have your attending veterinarian sign and date this sheet during each visit to your facility. This sheet should be kept with your PVC.

(b) (6), (b) (7)(C)

Veterinarian Signature

7/29/20

Date

(b) (6), (b) (7)(C)

Veterinarian Signature

9/10/20

Date

(b) (6), (b) (7)(C)

Veterinarian Signature

9/30/20

Date

(b) (6), (b) (7)(C)

Veterinarian Signature

11/25/20

Date

(b) (6), (b) (7)(C)

Veterinarian Signature

12-30-20

Date

(b) (6), (b) (7)(C)

2-3-21

Date

(b) (6), (b) (7)(C)

3-18-21

Date

(b) (6), (b) (7)(C)

Veterinarian Signature

4-15-21

Date

Note: This is an optional document to assist licensees/registrants in meeting the requirements of the regulations. Licensees/Registrants may develop their own formats if desired.

04/01/2013





# Patient History Report

**Client:** Guest Ranch, Wilstem (1428)  
**Phone:** (812) 936-4484  
**Address:** 550 W 36TH STREET  
 Jasper, IN 47546

**Patient:** Llama (1428-46)  
**Species:** Other Small  
**Age:** 0 Yrs. 0 Mos.  
**Color:**

**Breed:** Other Small  
**Sex:** Undetermined

Date	Type	Staff	History
12/30/2020	B	(b) (6), (b) (7)(C)	2.00 Sedation (SED10) by (b) (6), (b) (7)(C)
12/30/2020	B	(b) (6), (b) (7)(C)	2.00 CASTRATION (MISC) by (b) (6), (b) (7)(C)
12/30/2020	B	(b) (6), (b) (7)(C)	2.00 each of EXCEDE PER CC (LA853) by (b) (6), (b) (7)(C)
12/30/2020	B	(b) (6), (b) (7)(C)	2.00 each of BAR VAC C-D/T per dose (BARBV) by (b) (6), (b) (7)(C)
12/30/2020	B	(b) (6), (b) (7)(C)	1.00 WALK THRU (MISC) by (b) (6), (b) (7)(C)
2/6/2020	B	(b) (6), (b) (7)(C)	1.00 Farm Call (LA024) by (b) (6), (b) (7)(C)
2/6/2020	B	(b) (6), (b) (7)(C)	1.00 Exam Large Animal (LA330) by (b) (6), (b) (7)(C)
2/6/2020	B	(b) (6), (b) (7)(C)	10.00 each of Banamine Injection Per ml (AI210) by (b) (6), (b) (7)(C)
2/6/2020	B	(b) (6), (b) (7)(C)	10.00 [None] of PREDEFF 2X PER ML (1734) by (b) (6), (b) (7)(C)
9/23/2019	B	(b) (6), (b) (7)(C)	1.00 Farm Call-Return Trip (BO251) by (b) (6), (b) (7)(C)
9/23/2019	B	(b) (6), (b) (7)(C)	1.00 IV BANAMINE (MISC) by (b) (6), (b) (7)(C)
9/23/2019	B	(b) (6), (b) (7)(C)	1.00 DEX IM (MISC) by (b) (6), (b) (7)(C)
9/23/2019	B	(b) (6), (b) (7)(C)	1.00 each of FLUNAZINE EQ PASTE 30GM APPLE (FLUN9) by (b) (6), (b) (7)(C)
9/20/2019	B	(b) (6), (b) (7)(C)	1.00 Farm Call (LA024) by (b) (6), (b) (7)(C)
9/20/2019	B	(b) (6), (b) (7)(C)	1.00 IV BANAMINE (MISC) by (b) (6), (b) (7)(C)
9/20/2019	B	(b) (6), (b) (7)(C)	1.00 DEX IM (MISC) by (b) (6), (b) (7)(C)
9/9/2014	B	(b) (6), (b) (7)(C)	1.00 REPEAT CYDECTIN-ORALLY (MISC)
9/9/2014	B	(b) (6), (b) (7)(C)	1.00 each of (FIN)
9/9/2014	B	(b) (6), (b) (7)(C)	2.00 Fecal-STRONGYLES (LI500)
8/25/2014	B	(b) (6), (b) (7)(C)	30.00 each of CYDECTIN ORAL PER CC (CY235)
8/25/2014	B	(b) (6), (b) (7)(C)	1.00 each of BAR VAC C-D/T per dose (BARBV)
8/1/2014	B	(b) (6), (b) (7)(C)	1.00 each of (FIN)
8/1/2014	B	(b) (6), (b) (7)(C)	1.00 Fecal-STRONGYLES +++ (LI500)

Tx for llama  
 examined (Tx)

(b) (6), (b) (7)(C)

4-21-21

B: Billing, C: Med note, CB: Call back, CK: Check-in, CM: Communications, D: Diagnosis, DH: Declined to history, E: Examination, ES: Estimates,  
 I: Departing instr, L: Lab result, M: Image cases, P: Prescription, PA: PVL Accepted, PB: problems, PP: PVL Performed, PR: PVL Recommended,  
 R: Correspondence, T: Images, TC: Tentative medl note, V: Vital signs





I, (b) (6), (b) (7)(C) make the following statement pertaining to USDA Case IN210001-AC.

Animal and Plant  
Health Inspection  
Service

Emergency and  
Regulatory  
Compliance Services

Investigative and  
Enforcement Services

Riverdale, MD Office:  
4700 River Road  
Unit 85  
Riverdale, MD 20737  
Voice 301.851.2948  
Fax 301.734.4328

Raleigh, NC Office:  
920 Main Campus  
Drive Suite 200  
Raleigh, NC 27606  
Voice 919.855.7080  
Fax 919.855.7090

Fort Collins, CO  
Office:  
2150 Centre Avenue  
Building B-3W10  
Fort Collins, CO  
80526

Voice 970.494.7485  
Fax 970.494.7487

In the evening of 6 May 2021, Investigator (b) (6), (b) (7)(C) and I met (b) (6), (b) (7)(C) at her residence. Investigator (b) (6), (b) (7)(C) interviewed (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) in the kitchen area. (b) (6), (b) (7)(C) with (b) (6), (b) (7)(C) permission, witnessed the interview. After a few minutes, I asked (b) (6), (b) (7)(C) to allow me a few minutes to discuss a concern with some records.

We proceeded to the room adjacent to the kitchen; it appeared to be to the laundry room. I showed her 2 documents titled *Diagnosis/Observation Treatment Log Sheet*. One was dated 2-5-20 and the 2-6-20. Both were for the same animal, a llama. I asked her who created and entered the information on them. She stated that (b) (6), (b) (7)(C) entered all the information on these documents and that (b) (6), (b) (7)(C) signed the one dated 2-6-20.

She added that (b) (6), (b) (7)(C) completed these documents to document the information he directly received from the attending veterinarian and that these records are not meant to represent records completed by the veterinarian. They are for their record keeping purposes.

ROEL  
MALDONADO  
Digitally signed by ROEL  
MALDONADO  
Date: 2021.06.24  
09:40:26 -04'00'

Roel Maldonado  
North Central Area Director  
Supervisory Investigator, 3525



## AFFIDAVIT

I (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 4229 U.S. Highway 150, Paoli, IN 47454. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

Investigator (b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150, Paoli, IN 47454. Mailing address P.O. Box 88, French Lick, IN 47432. My phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C). My residential address is (b) (6), (b) (7)(C).

I have grown up around horses and trained for a year in West Virginia and have earned a certificate as. I am a certified horse trainer. I have grown up trail riding. I learned many techniques in proper horsemanship.

I worked for Wilstem for two years. I was hired as a wrangler and work as grounds and activity staff. My duties include taking care of the horses, guiding horseback rides, and operating the zipline. I work as needed and will do a little bit of everything. In the winter I work in the barn caring for the animals housed there.

I trained with the previous wrangler, learning the trails, and trained on the ATV trail rides. The ATV's rides have stopped due to cost and upkeep. I have learned on the job through job shadowing and hands on training and being shown what to do. Wilstem has no training manual specifically for Wilstem. Most of the written material has come from the internet and other resources. This information pertains to diets. All this information is kept in the "Roo" barn.

**2.4(b)(2) Adequate Veterinary Care**

On or about February 5, 2020 an older female llama became ill she just laid down and would not get up. The llamas were not on display, and the drive through was not in operation yet. Wilstem was in contact with the veterinarian. (b) (6), (b) (7)(C) came out and examined it and he recommended euthanasia. At the end of the day I was asked to help by (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at  
4229 U.S. Highway 150, Paoli, IN 47454 on this 5<sup>th</sup> day of May 2022

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615





## AFFIDAVIT

I, (b) (6), (b) (7)(C) being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) to pick up and transport the llama back to where it was to be buried. We picked up the llama with straps and used the excavator bucket as a hoist and put it in the back of the pickup truck. I told them we should shoot it right where it was, but they did not listen to me. I had just started working for Wilstem, Inc. and was just helping. We transported in the truck. (b) (6), (b) (7)(C) followed with the excavator to dig the hole for burial. He picked up the llama from the bed of the truck and placed in the hole. (b) (6), (b) (7)(C) was still in the truck. Instead of shooting it (b) (6), (b) (7)(C) used the bucket to hit the llama in the head before I removed the straps. He dropped the bucket fast and came down with hard impact. It all happened very fast. There was no struggle by the animal. We were going to shoot the llama and had called (b) (6), (b) (7)(C) "the bear guy" to let him know. Before I could say anything or stop him (b) (6), (b) (7)(C) dropped the bucket on its head.

On February 5, 2020 Jerry was told by someone, I do not know who told him what happened. There was a lot of talk around the facility about what had happened. He called me into his office and explained to me what we did wrong, like a reprimand. He was upset that I allowed that to happen. I felt bad that I did not take more of a stand to stop what was done. Within a short time, I received a write up and a three-day suspension without pay. I was handed a document to sign. The document states that the llama died in transport to the burial site. That is an incorrect statement. I do not feel that the llama was dead until it was hit by the bucket.

I do not know why or how this incident got brought back up at the USDA Animal Care inspection in September 15, 2020. I did not say anything. I tried to put it behind me and move on. I wanted to try to do better. I told her the same information.

I helped fix some of the fencing and helped find a blackbuck that was missing. When I found the blackbuck it was basically a skeleton. There was some blood on the driveway where the predator, probably a coyote, had killed the blackbuck. I was asked to put sand over it.

I have not been part of any other incidents. (b) (6), (b) (7)(C) no longer work here.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

(b) (6), (b) (7)(C)

SIGNATURE OF AFFIANT

Subscribed and sworn to before me at  
4220 U.S. Highway 150, Paoli, IN 47545 on this 5<sup>th</sup> day of May 2024

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615



Declaration of (b) (6), (b) (7)(C)

I declare that my name is (b) (6), (b) (7)(C) I am over the age of eighteen and I am fully competent to make this declaration. I know each of the facts set forth herein based on personal firsthand knowledge.

I am an Investigator employed by the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Investigative and Enforcement Services (IES), Badge number 3615. I have held this position since 2019. My office address is 920 Main Campus Drive, Suite 200, Raleigh, NC 27606, my office phone number is (b) (6), (b) (7)(C) and my cell phone number is (b) (6), (b) (7)(C). As an IES Investigator, my duties include conducting investigations that involve conducting interviews, obtaining sworn statements, collecting evidence, and preparing investigative reports.

On April 22, 2021 Supervisory Investigator Roel Maldonado and I met with (b) (6), (b) (7)(C) at the Orange County Animal Clinic, located at 2840 N. St. Rd. 37, Paoli, IN 47454. (b) (6), (b) (7)(C) provided a statement to us regarding Wilstem, Inc. (b) (6), (b) (7)(C) stated he began working for Jerry Fuhs/Wilstem, Inc approximately ten years ago when the property was operating as Wilstem Guest Ranch. (b) (6), (b) (7)(C) stated the only animals he treated at that time were horses. He stated that he has advised Wilstem, Inc that he is not an expert in wild and/or exotic animals. (b) (6), (b) (7)(C) also stated that he consults with experts from the University of Illinois, University of Tennessee, and the Zoo in Louisville, KY, when he needs advice for the care of wild and/or exotic animals.

He stated that Wilstem manages the re-capture of any escaped animals. (b) (6), (b) (7)(C) stated that he has only provided tranquilizer medication and "loaded" the darts with tranquilizer for Wilstem. He has also written a prescription for tranquilizer, so that Wilstem can order the medication needed from an animal pharmaceutical company, Zoopharm. (b) (6), (b) (7)(C) stated that he was not present on or about May 6, 2020 when 3 elands escaped their enclosure. He signed a statement, provided to him by Jerry Fuhs, to that effect on or about October 15, 2020. He also stated that the kangaroo, "Perth", was presented to him deceased on or about August 10, 2020, when he conducted a necropsy. (b) (6), (b) (7)(C) stated that he did provide treatment to a llama on or about February 6, 2020. Wilstem staff reported the worsened condition of the llama the following day he advised euthanasia. I presented (b) (6), (b) (7)(C) with two Diagnosis/Observation Treatment Log Sheets for the llama. He stated that the treatments follow what he would recommend, but he did not fill them out, nor did he sign them. He did not know who had filled out the forms.

(b) (6), (b) (7)(C) stated he feels that Wilstem has worked to improve enclosures, animal health and welfare, and record keeping since the Animal Care inspection on or about

(b) (6), (b) (7)(C)

Signature



September 15, 2020. (b) (6), (b) (7)(C) provided us with a signed affidavit and copies of the Plan of Veterinary Care.

On April 22, 2021 Supervisory Investigator Roel Maldonado and I met with former Wilstem, Inc employee (b) (6), (b) (7)(C) at 889 Gospel Street, Paoli, IN 47454.

(b) (6), (b) (7)(C) provided us a statement regarding the time she worked for Wilstem, Inc. In her statement (b) (6), (b) (7)(C) detailed her involvement in the darting and re-capture of the elands. She also stated that there were concerns over "Perth" the kangaroo prior to his escape and euthanasia. (b) (6), (b) (7)(C) also stated that she found the donkey, "Daisy", in the pasture with a bone protruding through the skin the day after (b) (6), (b) (7)(C) had stated that the only course of action was euthanasia. She called him at that time, and she stated he responded immediately. She was not directly involved with the "llama incident" but had heard about it from other Wilstem staff.

She stated that she had no prior experience with wild and/or exotic animals, her experience had been with farm animals. (b) (6), (b) (7)(C) stated that she was not offered any training with any of the animals. She stated she was told to "figure it out" when assigned a specific animal training duty.

(b) (6), (b) (7)(C) stated she has more information to share and would draft an email later in the week of April 26, 2021. She stated that she felt as though she had been forced out of Wilstem, Inc. by Mr. Fuhs and (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) stated there were several changes in staff and job titles. She stated that the decisions to change staff members duties or position titles were not clear to anyone as to how or why they were made.

On April 22, 2021 Supervisory Investigator Roel Maldonado and I met with Mr. Jeff Watson at 1399 Liberty Drive, Bloomington, IN 47403. Mr. Watson is a current contract exhibitor with Wilstem, Inc. He owns 5 Grizzly Bears, two of which are currently housed at the Wilstem, Inc. facility. The other three are still at his home, but enclosures are being built at Wilstem, Inc to house them as well. He is the DNR permit and the USDA license holder for these bears. He has been with Wilstem, Inc since May 2018 and his first two bears moved to the facility in October 2018.

Mr. Watson stated that there had been some "issues" between him and Jerry Fuhs regarding his contract in the past, but they have been worked out. He stated that he and Mr. Fuhs are getting along at the present time and that his contract was providing satisfactory payment. Mr. Watson also stated that (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)

He stated that the only event that he was witness to, was the darting of the three escaped elands. The crushing of the llama skull and the euthanasia of the donkey were told to him by other Wilstem, Inc staff. Mr. Watson also stated that "I'm the bear guy."

(b) (6), (b) (7)(C)

Signature



and keeps to himself with the bears towards the back of the property, therefore he does not have firsthand knowledge of events or accidents that may happen on the property. He also stated that he is not privy to many of the text messages or other staff/facility correspondence. Mr. Watson stated that he has never been part of a staff meeting, staff training, either as an attendant or as an instructor, nor has he ever attended a Wilstem safety meeting. He stated he has been there a little more than two years and to his knowledge none of these types of meetings have ever been held.

Mr. Watson stated that there has been staff turnover at Wilstem, Inc. since he began working there as a contractor. He stated there does not seem to be any clear definition of job duties or titles. He stated changes in position and responsibilities seems arbitrary depending on who Mr. Fuhs may be upset with on a particular day.

During our discussion Mr. Watson recommended a few other current and former staff members to interview but declined to provide a signed statement at that time. He asked that we interview some of the other potential witnesses first and then return to him.

(b) (6), (b) (7)(C)

On April 26, 2021 I sent an email to (b) (6), (b) (7)(C) former Wilstem, Inc staff member and then spoke to him on the phone the evening of April 26, 2021. I informed him that I would like to speak to him as a possible witness to allegations against Wilstem, Inc. (b) (6), (b) (7)(C) stated that he would contact me again by email with general information regarding his time and duties at Wilstem, Inc. He also stated that he would be willing to provide an affidavit in this case.

On May 4, 2021 I confirmed an appointment with (b) (6), (b) (7)(C) for Wednesday, May 5<sup>th</sup> at 3:00 p.m. We will meet at his office at 7040 N. State Rd 337, Orleans, IN 47452 to review and complete his statement regarding case IN210001 AC.

On May 4, 2021 I spoke, via phone call, to (b) (6), (b) (7)(C) about meeting me to discuss allegations regarding Wilstem, Inc. (b) (6), (b) (7)(C) stated that he would be willing to meet with me, but he would not be available until after his mare had foaled. I stated that I had no problem meeting him at his home or barn and that he did not need to leave. He stated that he preferred to contact me later to meet elsewhere. I gave him my name and government cell phone number.

I also called (b) (6), (b) (7)(C) to schedule a meeting and told him I would be in the area until Thursday, May 6<sup>th</sup>. He stated that he is self-employed and would have to check his schedule for availability. I stated I would be willing to meet late in the evening or in the mornings. I sent (b) (6), (b) (7)(C) a text message outlining times of availability for me, and that I would be willing to meet him at his home or another location if he preferred. He

(b) (6), (b) (7)(C)

Signature

responded to my text after approximately 1 hour and 20 minutes that he is "sorry but 'he' is really busy with work right now."

(b) (6), (b) (7)(C) was the third person with whom I attempted to set up a meeting. I informed him that it was regarding Wilstem, Inc and alleged Animal Care violations. (b) (6), (b) (7)(C) stated that he was at a local tavern "having some beers", and did not think this evening, May 4, 2021, would be a good time to talk. I stated that I would be in the area until Thursday, May 6, 2021 and would be willing to work with his schedule. He stated that he did not want to "talk about Jerry" and did not want to meet with me at all.

On May 4, 2021, Roel Maldonado and I drove to Wilstem, Inc. after hours and spoke to (b) (6), (b) (7)(C) who is a staff member and lives on the property. (b) (6), (b) (7)(C) stated that he needed to make a phone call to (b) (6), (b) (7)(C) as he is usually the Wilstem, Inc representative to the USDA. (b) (6), (b) (7)(C) did not answer, so (b) (6), (b) (7)(C) called Jerry Fuhs. (b) (6), (b) (7)(C) stated that "tomorrow" would be a better time to catch people. The facility opens at 8:00 a.m. and they "are trying to have a brief, like 5-minute, staff meeting" each morning. Mr. Fuhs arrived within minutes and spoke to us about setting up a meeting time for himself and Wilstem, Inc employees for Wednesday, May 5, 2021. Mr. Fuhs stated that his daughter, (b) (6), (b) (7)(C) is the person who takes care of all the paperwork and would be the best person to get records. He stated that she works on Tuesday. I gave (b) (6), (b) (7)(C) and Mr. Fuhs my card and contact information. (b) (6), (b) (7)(C) called me within an hour and stated that she would meet with us on Wednesday, May 5, 2021 to provide paperwork and records.

On May 6, 2021 Roel Maldonado and I drove to the home of (b) (6), (b) (7)(C) to conduct an interview with (b) (6), (b) (7)(C) regarding the escape of three elands. (b) (6), (b) (7)(C) had been unable to meet with us during the regular business hours due to his busy schedule at the Wilstem, Inc facility.

While I interviewed (b) (6), (b) (7)(C) Roel Maldonado spoke with (b) (6), (b) (7)(C). During their conversation he presented the Diagnosis/Observation Treatment Log Sheets dated February 5, 2020 and February 6, 2020, there is also a handwritten "Appendix C" in the upper right hand corner of the sheets, to inquire if she was familiar with those sheets and if she knew who's signature was on them. (b) (6), (b) (7)(C) was familiar and stated that (b) (6), (b) (7)(C) had signed the sheets.

I declare under penalty of perjury that the foregoing is true and correct to the best of my recollection and knowledge. I executed this declaration on May 6, 2021.

(b) (6), (b) (7)(C)

Signature



# Humane Euthanasia Guidelines Wilstem Wildlife Park

## When to Euthanize

-Decision to euthanize an animal shall be made upon evaluation of the individual by the animal care staff and veterinary care staff (b) (6), (b) (7)(C). The decision shall be based on a quality of life evaluation. Factors considered include lack of response to treatment of disease or condition which affects the animal's quality of life or when the animal's quality of life has declined to a point where euthanasia is the humane option.

-The veterinary staff shall be consulted in the event of any euthanasia.

-In the case of critical injury or other severe condition and the veterinary staff cannot be reached, euthanasia by firearm will be allowed by Wilstem Wildlife Park staff following these criteria:

- Attempt to Contact (b) (6), (b) (7)(C)
- Pictures will be sent to (b) (6), (b) (7)(C) prior to any euthanasia.
- In the event we are unsuccessful in making contact with (b) (6), (b) (7)(C) and the animal is inhumanely suffering, staff will be permitted to proceed with euthanasia by firearm.

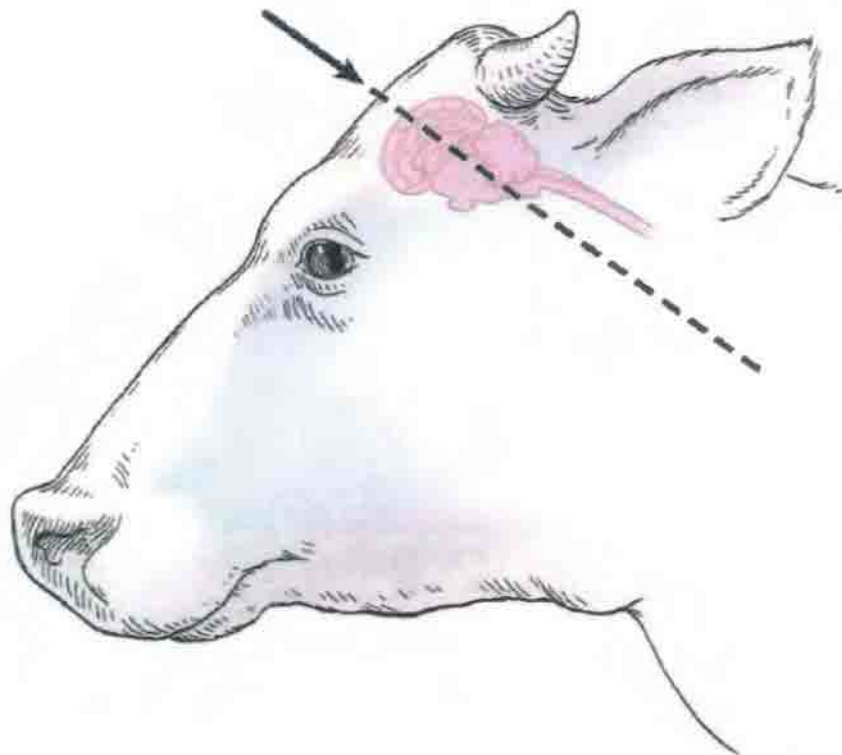
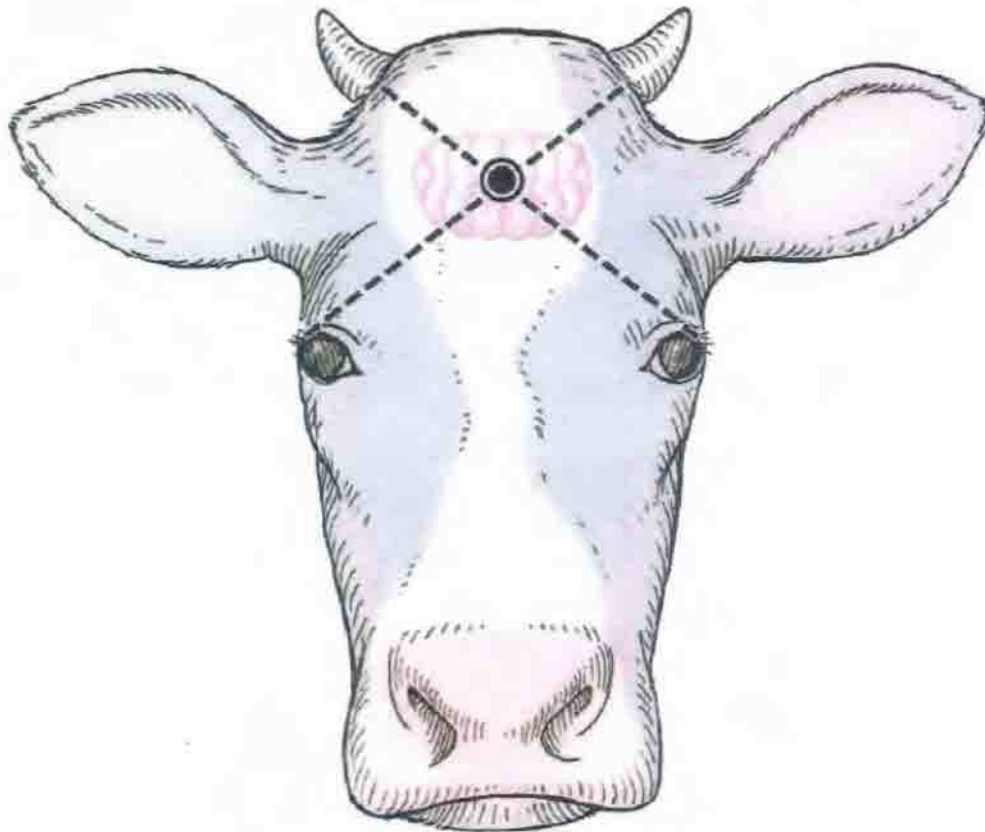
## Method of euthanasia

- Euthanasia shall be carried out by intravenous injection of Fatal Plus (pentobarbital) by the veterinary staff, or via firearm as described in the AVMA Guidelines for Euthanasia of Animals.

- Handguns do not typically achieve the muzzle energy required to euthanize animals weighing more than 400 lb (180 kg), and therefore rifles must be used to euthanize these animals.

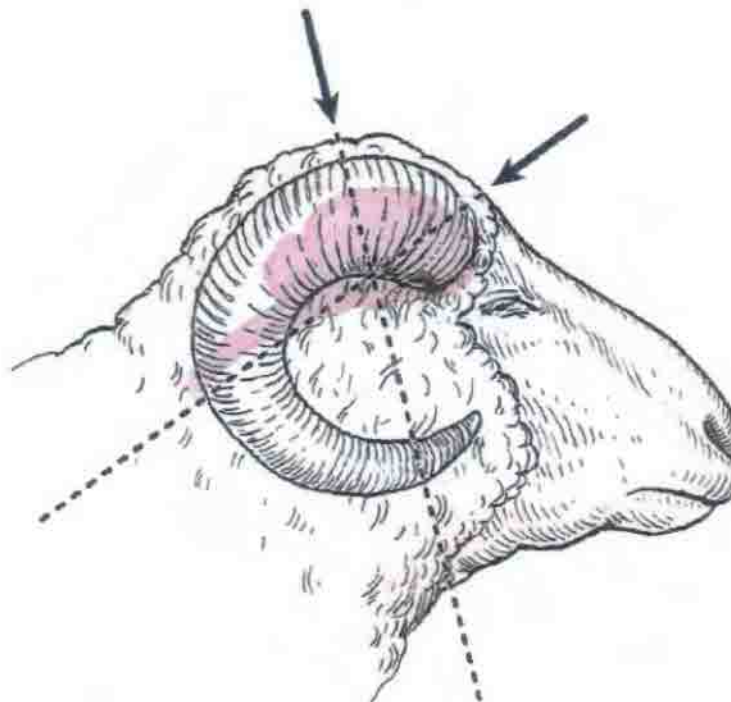
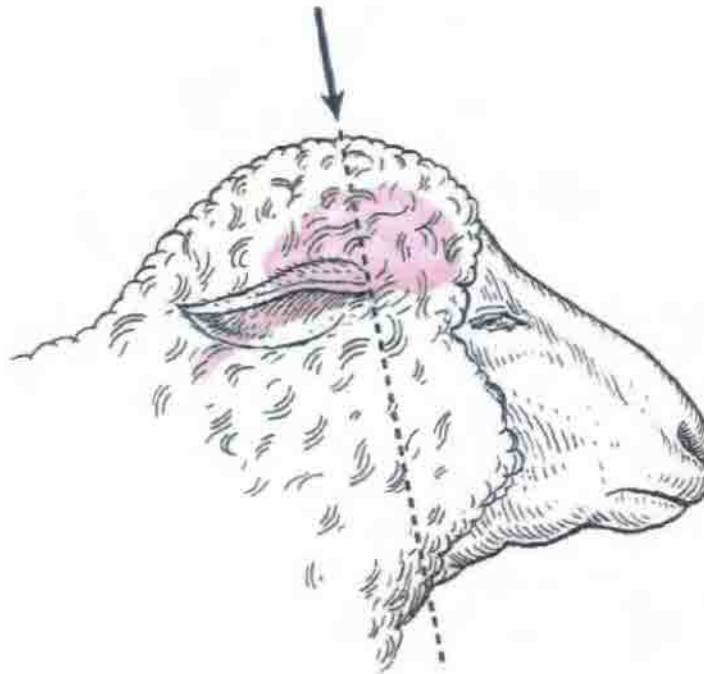


Bovidae



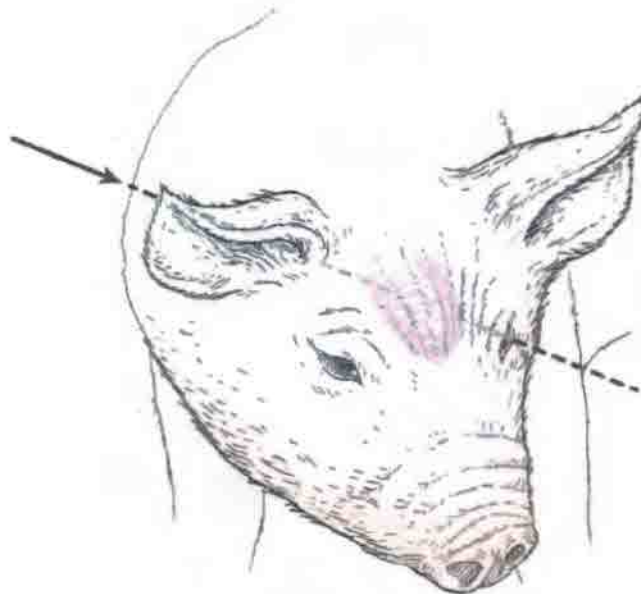
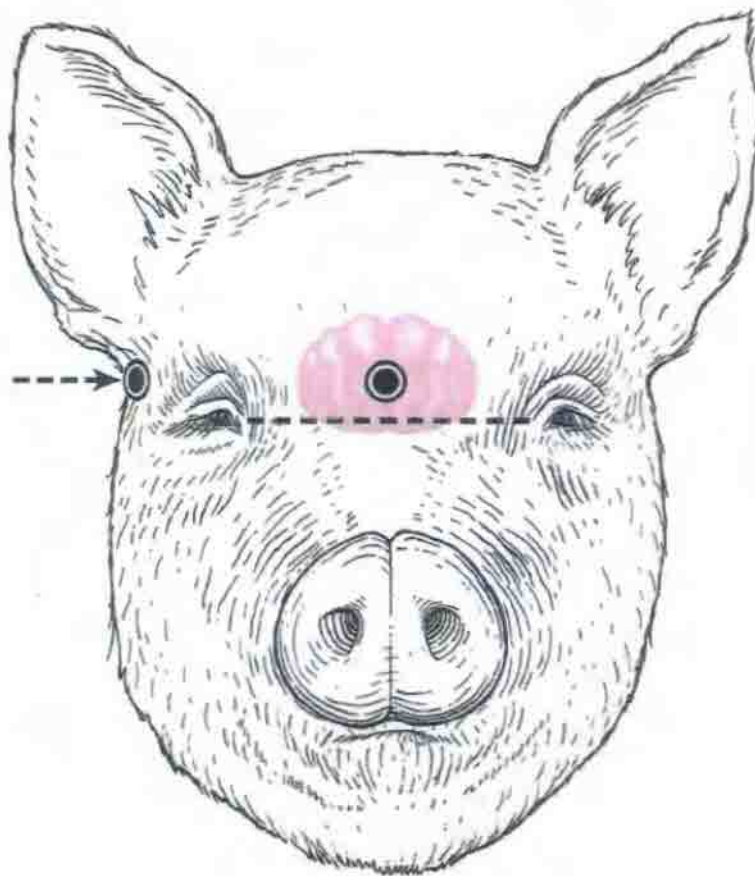
Anatomic site for gunshot and desired path of the projectile in cattle. The point of entry of the projectile should be at the intersection of two imaginary lines, each drawn from the outside corner of the eye to the center of the base of the opposite horn, or an equivalent position in polled animals.

Ovidae/Capridae



Anatomic sites for gunshot and desired path of the projectile in sheep and goats. For polled sheep (top), the proper site is at or slightly behind the poll aiming toward the angle of the jaw (ie, base of tongue). For heavily horned rams or ewes (bottom), the proper site is high on the forehead aiming toward the spinal canal or, alternatively, at or slightly behind the poll, aiming toward the angle of the jaw or base of the tongue. The brain of a mature goat lies in a more caudal position in the skull than one would expect. The proper site for use of the free bullet is from behind the poll aiming toward the muzzle and lower part of the chin. In mature horned sheep and goats the hardness of the skull may deflect some projectiles.

Suidae

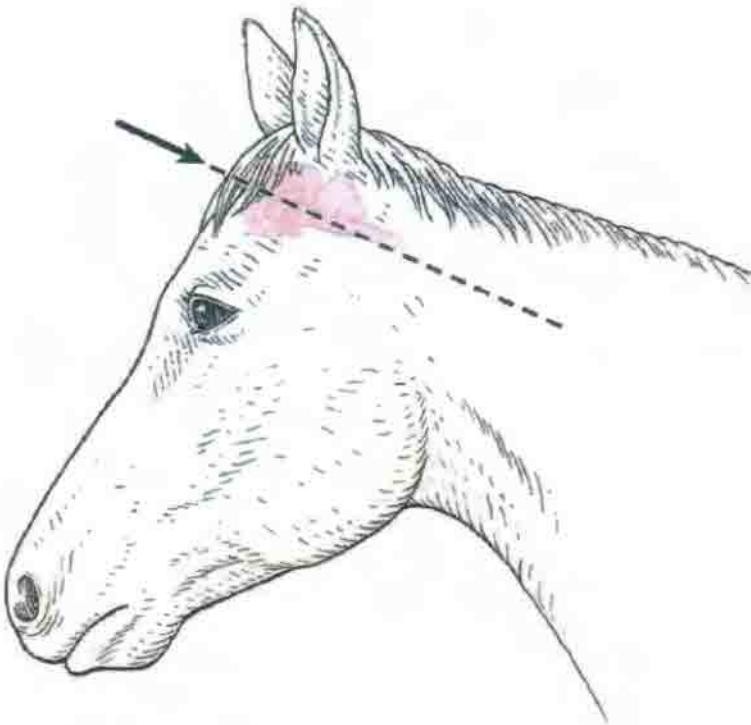
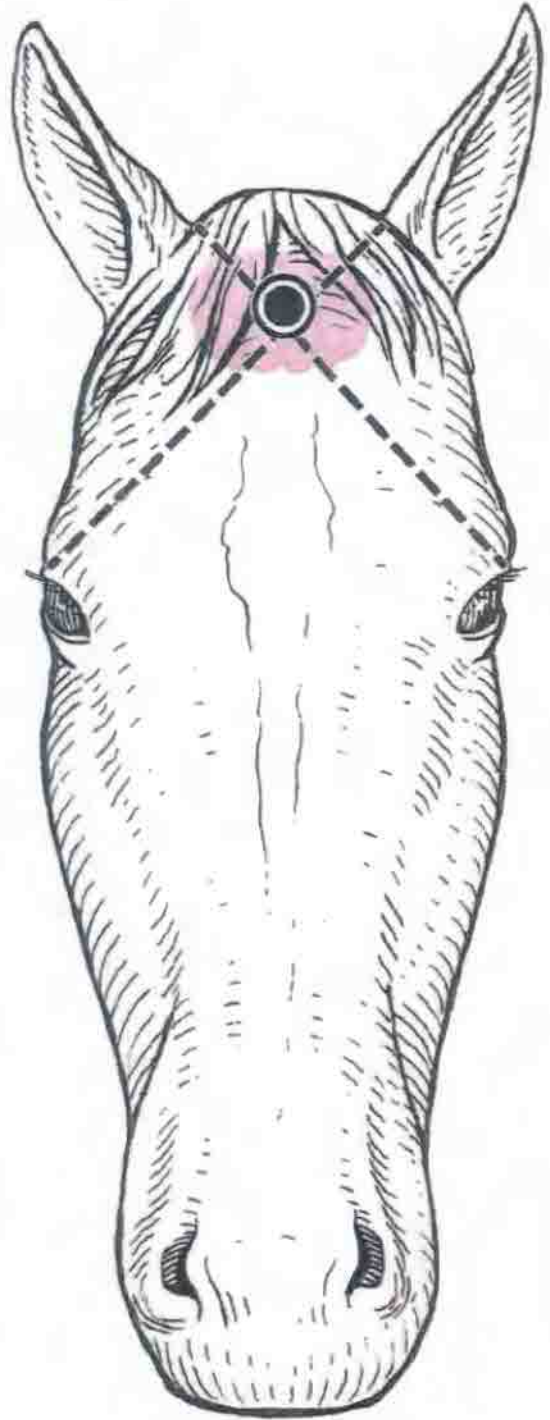


There are three possible sites for conducting euthanasia in swine: frontal, temporal and from behind the ear toward the opposite eye. The frontal site is in the center of the forehead slightly above a line drawn between



age of the animal

Equidae



Anatomic site for the application of gunshot for euthanasia of equids. The point of entry of the projectile should be at the intersection of two imaginary lines, each drawn from the outside corner of the eye to the center of the base of the opposite ear.

Euthanasia, Panel on. "AVMA Guidelines for the Euthanasia of Animals: 2013 Edition." Schaumburg: American Veterinary Medical Association, 2013.

(b) (6), (b) (7)(C)

10-13-20

(b) (6), (b) (7)(C)

Date

(b) (6), (b) (7)(C)

10-13-2020

Jerry Fuhs, Wilstem President

Date

# Appendix E

October 14<sup>th</sup>, 2020

Please see below statements from (b) (6), (b) (7)(C) in reference to attached Inspection Report and appeal.

February 5, 2020:

(b) (6), (b) (7)(C) from Wilstem, Inc., had contacted me regarding a sick llama at the beginning of February 2020. I was aware of and in consultation regarding the sick llama.

May 13, 2020:

Regarding the Eland issue at Wilstem, Inc., I will acknowledge Jerry Fuhs met with me on property to challenge me on whether or not I was present for the darting of the Eland. At which point, I explained to him I had been here for the zebra in the same location, and that I did request a staff member dart the zebra after I missed. I did provide the darts for them to dart the Eland on this date.

(b) (6), (b) (7)(C)

10-15-20

(b) (6), (b) (7)(C)

Date

(b) (6), (b) (7)(C)

4-25-21



## AFFIDAVIT

I, Jeff Watson, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) who identified herself as an Investigator with the USDA, APHIS, Investigative and Enforcement Services, badge number 3615. She met with me at 1399 S. Liberty Dr., Bloomington, IN 47403. Supervisory Investigator Roel Maldonado, badge 3525, was present during this interview.

(b) (6), (b) (7)(C) has informed me this statement is in reference to USDA Case ID IN210001AC. This case involves Wilstem Inc., located at 4229 U.S. Highway 150. Paoli, IN 47454. The mailing address is P.O. Box 88, French Lick, IN 47432. My cell phone number is (b) (6), (b) (7)(C) and my email address is (b) (6), (b) (7)(C). My mailing and physical residential address is 732 W. Porter Ridge Road, Spencer, IN 47460.

I have owned, trained, raised and exhibited American Black and Brown Bears for approximately the past 32 years, specifically, since August of 1988. I hold a USDA APHIS Class C Exhibitor's license, certificate number 32-C-0015, customer number 2635.

As a professional Grizzly Bear handler, my bears and I have appeared in numerous films, wildlife documentaries, television news/talk shows, magazines and live safety demonstrations at hunting and fishing expositions around the U.S. and abroad. I am considered a subject matter expert in Grizzly Bear handling, and as such, I have provided expert witness testimony for the USDA APHIS during Federal Administrative Hearings and I have also provided testimony at hearings before the Indiana State Legislature regarding proposed state wildlife legislation. I am well versed in the 9 C.F.R., the Animal Welfare Act and Animal Welfare Regulations, most specifically with regard to bears.

Currently, I am exhibiting my bears at the "Grizzly Ridge" Grizzly Encounter feature located at the Wilstem Wildlife Park. I initially signed a three-year contract with Wilstem, Inc. but recently signed a new contract extending my term for an additional year. I began exhibiting my bears at Wilstem, Inc. on October 20, 2018. My first two bears, Bob and Screech, moved to the facility at Wilstem, Inc. on October 19, 2018. My remaining three bears are contractually scheduled to make the move to Wilstem during the spring of 2021, sometime after the construction of the new bear enclosure is completed.

(b) (6), (b) (7)(C)

SIGN

Subscribed and sworn to before me at 1399 Liberty Drive  
Bloomington, IN 47403 this 5<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)



## AFFIDAVIT

I, Jeff Watson, being duly sworn on oath make the following statement

Since I began working as a contractor at Wilstem, Inc. there has been a fair number of employees who have either quit or were fired. Some employees who were at the facility when I started left Wilstem and were then re-hired at a later date. During my time at Wilstem, employee turnover, which includes office staff, house keepers, maintenance personnel as well as animal caretakers and keepers has amounted to approximately 15 or so employees.

During my time as a contractor at Wilstem, I have never attended nor conducted any formal type of safety training event with all staff members present. I personally am aware of only one document regarding safety protocols at Wilstem and it is titled, "Wilstem Wildlife Park Biosecurity, Safety and Contingency Plan" but I'm not aware if it has ever been distributed to staff. I was asked to contribute my thoughts and ideas for this plan but as far as I'm concerned it is useless if actual physical staff training doesn't accompany the document. After two years of displaying bears at Wilstem I was invited to join a staff meeting where they were going to go over the new safety plan, feeding schedules, etc. I was told that I could join "if I would like to go over the grizzly piece". As a bear handler with 30 plus years of experience, a safety manual is useless, in my opinion, if staff isn't physically walked through the various possible emergency scenarios. Telling a staff member that there is a shotgun in my cabin without them ever physically seeing it is a waste of time. I have had a few discussions with management over the past few years during which I proposed having safety meetings with staff members solely addressing safety protocols involving the Grizzly Encounter. These meetings were promised but they never came to fruition. There has also been mention of firearm training for staff members should there be an animal escape and where rubber bullets and/or lethal ammunition could possibly need to be used, but there has been no such firearms training to date. I rely on myself and God.

On Thursday September 17, 2020, Wilstem provided two-way radios to some members of the staff. As a contractor with dangerous apex carnivores, I received a radio so that I could contact the office should there be an emergency at the Grizzly Encounter. The previous 23 months, I had to rely on my cell phone as my only form of communicating with the office should there be a safety incident. I found this system to be very inefficient considering that a cell signal was not

(b) (6), (b) (7)(C)

SIGN

Subscribed and sworn to before me at 1399 Liberty Drive  
Bloomington, IN 47403 this 5<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 1 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





## AFFIDAVIT

I, Jeff Watson, being duly sworn on oath make the following statement

always available and because office staff, at times, could not or would not, answer phones due to being overwhelmed with customers. I had heard talk about using color coded messages, such as code yellow, red, etc., for responses to incidents with my understanding being that this was purposed to help keep the public from becoming excited and frantic should they hear an emergency message come across the radio. I was never personally trained on this color-coded message system nor did I receive any training literature regarding the color-coded radio message system. The only discussion I personally had with office staff concerning the two-way radios was what channel I should be on, which is channel one.

I am a contracted bear handler at Wilstem and am not an hourly or salaried employee of Wilstem Inc., therefore, I generally keep to myself with my bears at the back of the property and do not participate in most staff meetings. Please note, I'm not invited to the majority of these meetings because they don't involve me, specifically meetings addressing employee benefits. Of course, I interact with hourly and salaried employees occasionally and these employees have shared with me things that are concerning to them with respect to the daily operations of the park. For example, I've had an employee share with me the information contained within group staff text messages that they had received from (b) (6), (b) (7)(C) at Wilstem. I cannot verify the origin or legitimacy of these texts; however, I have no reason to believe that they were not sent to staff by (b) (6), (b) (7)(C). I specifically remember a group staff text message addressing the escape and re-capture of a kangaroo named Perth. The message instructed the staff on how to address the matter with the public should they be asked about the incident. My understanding is that Perth escaped during business hours while on exhibit therefore the public most likely witnessed the escape. I did not personally witness this animal incident.

On May 13, 2020 three elands escaped their primary enclosure but never left the Wilstem, Inc. property as far as I'm aware. Upon arriving at work, park owner Jerry Fuhs informed me of the escape, so I then took it upon myself to drive my golf cart around the property to help locate the escaped animals. I was informed, but did not personally witness, that one of the eland was darted by staff member (b) (6), (b) (7)(C) and moved back to a barn stall to be observed while recovering from the tranquilizer and that staff member (b) (6), (b) (7)(C) was assigned the task of observing the recovery. The other two eland were being tracked by (b) (6), (b) (7)(C).

(b) (6), (b) (7)(C)  
SIGN \_\_\_\_\_

Subscribed and sworn to before me at 1399 Liberty Drive  
Bloomington, IN 47403 this 5<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)





## AFFIDAVIT

I, Jeff Watson, being duly sworn on oath make the following statement

(b) (6), (b) (7)(C) and by myself, (b) (6), (b) (7)(C) were tracking by themselves and I was tracking alone. (b) (6), (b) (7)(C) had the tranquilizer gun and once I located the remaining two elands, I yelled through the woods to (b) (6), (b) (7)(C) because my cell phone battery had died and there was no other form of communication available. (b) (6), (b) (7)(C) approached the Eland and (b) (6), (b) (7)(C) darted one of them. I could not see (b) (6), (b) (7)(C) from my location, but after hearing the dart gun being fired, I witnessed (b) (6), (b) (7)(C) running out of the woods holding what appeared to me to be a tranquilizer gun. The two Eland ran away frantically after the one was darted and they both started bouncing off of fences near their enclosure and eventually ran into a fenced field. (b) (6), (b) (7)(C) had one dart left and attempted to dart the third eland but missed the target. The Eland that was not darted was so worked up from the experience that it ran headfirst into a fence post and broke its neck. In my opinion, it was not necessary to attempt darting the third eland because it was now contained, and the animals should have been allowed to settle down and decompress from the traumatic experience.

I have had an opportunity to review and read my statement. It is true and correct to the best of my knowledge.

SIGNATURE

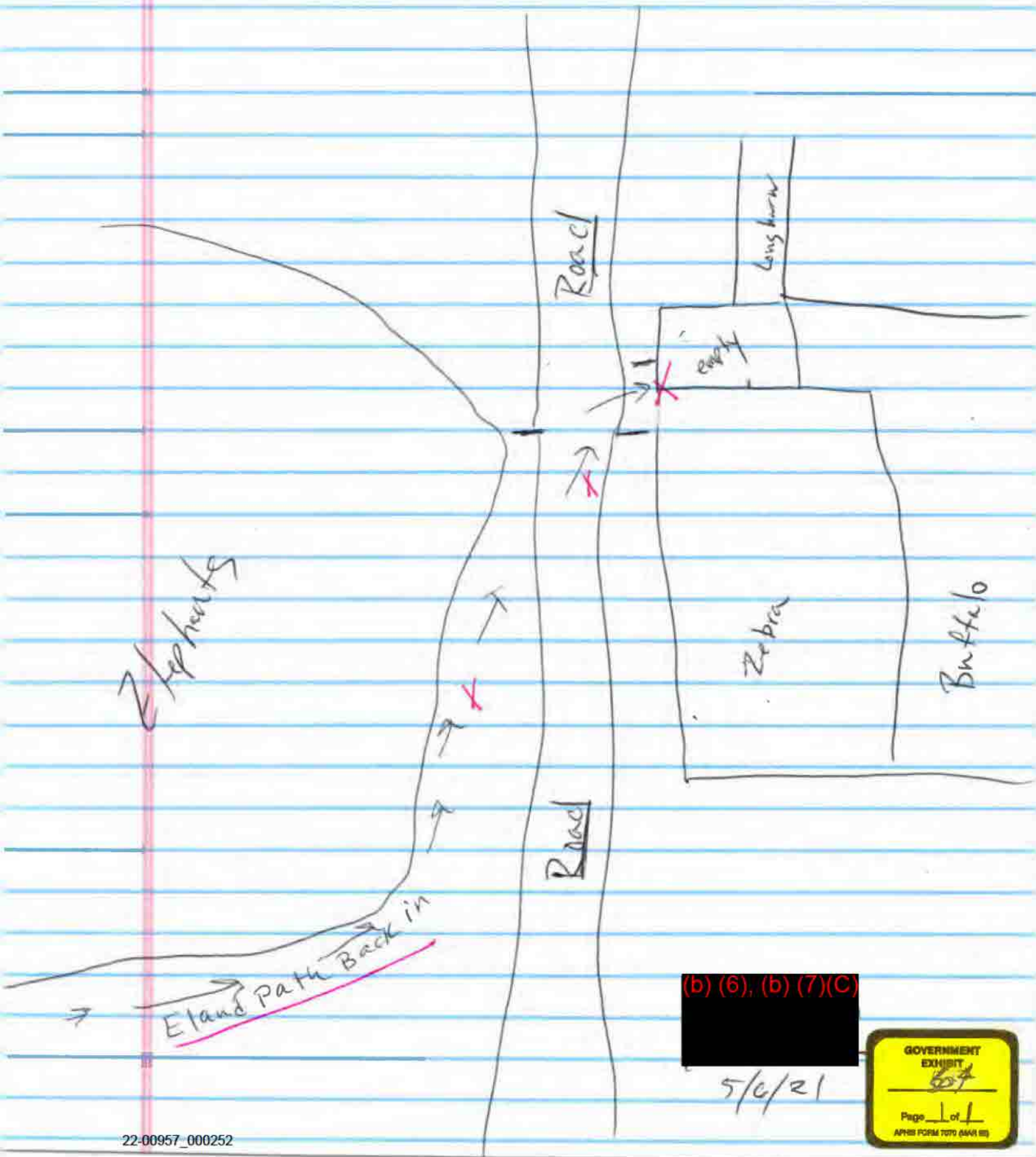
(b) (6), (b) (7)(C)

Subscribed and sworn to before me at 1399 Liberty Drive  
Bloomington, IN 47403 this 5<sup>th</sup> day of May 2021.

(b) (6), (b) (7)(C)

DESIGNATED PURSUANT TO 7 U.S.C. 2217 TO  
ADMINISTER OATHS, AFFIDAVITS, AND AFFIRMATIONS,  
AUTHORITY NO 3615.





(b) (6), (b) (7)(C)

5/6/21





Animal and Plant  
Health Inspection  
Service

Emergency and  
Regulatory Compliance  
Services

Investigative and  
Enforcement Services

Riverdale, MD Office:  
4700 River Road  
Unit 85  
Riverdale, MD 20737  
Voice 301.851.2948  
Fax 301.734.4328

Raleigh, NC Office:  
920 Main Campus Drive  
Suite 200  
Raleigh, NC 27606  
Voice 919.855.7080  
Fax 919.855.7090

Ft. Collins, CO Office:  
2150 Centre Avenue  
Building B-3W10  
Fort Collins, CO 80526  
Voice 970.494.7485  
Fax 970.494.7487

VIA: UPS Express Carrier  
Shipping Event: 1st

Wilstem, Inc.  
P.O. Box 88  
French Lick, IN 47432

Jerry J. Fuhs  
550 West 36th Street  
Jasper, IN 47546

February 2, 2022

## SETTLEMENT AGREEMENT

To Whom It May Concern:

We believe that you violated the Animal Welfare Act (7 U.S.C. § 2131 et seq.) (AWA), as described in the attached Settlement Agreement. Our agency, the Animal and Plant Health Inspection Service (APHIS), is responsible for enforcing the AWA, and other agriculture laws that help prevent the spread of animal and plant pests and diseases, and ensure the welfare of animals.

After providing you with an opportunity for a hearing, we may impose civil penalties of up to \$10,000, adjusted for inflation, or other sanctions, for each alleged violation described in this Settlement Agreement. We are offering you the opportunity to resolve this matter by paying an amount that is much lower than the maximum civil penalty.

*What are the terms of the Settlement Agreement?*

You should review the information in this Settlement Agreement, including the citation and notification of penalty.

If you agree to waive your right to a hearing and pay the penalty, then do the following:

- Pay the amount due, \$8,000, by **March 4, 2022**. You can pay by check, money order, or credit card. For your convenience, we have included additional instructions for making payments.
- If you are unable to pay the full amount due by **March 4, 2022**, you may be eligible for a payment plan. To request a payment plan, you must use the enclosed form to submit a written response to this letter by **March 4, 2022**, that indicates you wish to pay the penalty and waive your right to a hearing. You must also submit a copy of your most recent federal tax return. As part of your response, please include a phone number and an email address so that we may contact you.





*What are my other options?*

If you do not agree with the terms of this Settlement Agreement, submit a written request for a hearing, with your Case Number, to our office by **March 4, 2022**, at 4700 River Rd., Unit 85, Riverdale, MD, 20737.

*What happens if I fail to respond?*

If we do not receive a payment or hearing request from you by **March 4, 2022**, we will forward this matter to our Office of the General Counsel for litigation.

*What should I do if I need help?*

If you have any questions concerning this letter, contact Jennifer Jones at (301) 851-2780, or call our main office at (301) 851-2948.

*I am a small business owner and have comments or concerns regarding APHIS's enforcement of animal and plant health laws. Who should I contact?*

APHIS always welcomes comments on how it can better assist small businesses. If you have comments about APHIS's enforcement of animal and plant health laws, please contact Michon Oubichon, the APHIS Small Business Ombudsperson, at (301) 851-2948. If you would prefer to comment to someone outside APHIS, you may contact the Small Business Regulatory Enforcement Ombudsman at <http://sba.gov/ombudsman>, email [ombudsman@sba.gov](mailto:ombudsman@sba.gov), or toll free at 1-888-REG-FAIR. The SBA Ombudsman's office receives comments from small businesses and annually evaluates federal agency enforcement activities for their responsiveness to the special needs of small businesses.

Sincerely,

Eileen F. Sullivan, Director  
Investigative and Enforcement Services



Wilstem, Inc.  
P.O. Box 88  
French Lick, IN 47432

### **CITATION AND NOTIFICATION OF PENALTY**

We believe that you violated the Animal Welfare Act (7 U.S.C. § 2131 et seq.) (AWA), as described below.

#### **Date of Alleged Violation: September 15, 2020**

**9 C.F.R. § 3.127(d)** Facilities, outdoor. Perimeter fence.

On or after May 17, 2000, all outdoor housing facilities (i.e., facilities not entirely indoors) must be enclosed by a perimeter fence that is of sufficient height to keep animals and unauthorized persons out. Fences less than 8 feet high for potentially dangerous animals, such as, but not limited to, large felines (e.g., lions, tigers, leopards, cougars, etc.), bears, wolves, rhinoceros, and elephants, or less than 6 feet high for other animals must be approved in writing by the Administrator. The fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the facility. It must be of sufficient distance from the outside of the primary enclosure to prevent physical contact between animals inside the enclosure and animals or persons outside the perimeter fence.

You failed to construct a perimeter fence of sufficient height to keep animals and unauthorized persons out.

During an inspection, APHIS officials observed a thirty-foot section of the perimeter fence in a wooded area of the facility with four sections of fencing that were raised five to eight inches from the ground.

The fence must be constructed so that it protects the animals in the facility by restricting animals and unauthorized persons from going through it or under it and having contact with the animals in the facility.

#### **Date of Alleged Violation: August 8, 2020**

**9 C.F.R. § 3.125(a)** Facilities, general. Structural strength.

The facility must be constructed of such material and of such strength as appropriate for the animals involved. The indoor and outdoor housing facilities



shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals.

You failed to construct housing facilities of such material and of such strength as appropriate for animals. During an inspection, APHIS officials identified that a kangaroo ("Perth") escaped its enclosure by jumping over a five-foot fence. The animal was not found until two days later.

The facility must be constructed of such material and of such strength as appropriate for the animals involved. The indoor and outdoor housing facilities shall be structurally sound and shall be maintained in good repair to protect the animals from injury and to contain the animals.

**Date of Alleged Violation: May 13, 2020**

**9 C.F.R. § 2.40** Attending veterinarian and adequate veterinary care (dealers and exhibitors).

(b) Each dealer or exhibitor shall establish and maintain programs of adequate veterinary care that include:

(2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

You failed to use appropriate methods to prevent, control, diagnose, and treat diseases and injuries.

During an inspection, APHIS officials identified that after three elands escaped their enclosure, and were loose on the grounds of the facility, Wilstem, Inc. personnel attempted to recapture the animals using a tranquilizer dart gun. After hearing the sound of the dart gun, the animals ran into various areas of the facility. A female eland ran into a fence post and broke its neck. The method of recapture was not approved by the attending veterinarian and resulted in unnecessary pain, discomfort and death.

**Date of Alleged Violation: On or about February 5, 2020 or February 6, 2020**

**9 C.F.R. § 2.131(b)(1)** Handling of animals.

Handling of all animals shall be done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.

You failed to handle animals expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.





On or about February 5, 2020 or February 6, 2020, Wilstem, Inc. personnel euthanized a llama by dropping the live animal in a hole intended for burial and crushing its skull with an excavator bucket. The use of heavy machinery is not an approved method of euthanasia in the program of veterinary care or the attending veterinarian.

The penalty for the alleged violation(s) described above is \$8,000.



## How To Pay The Penalty

You may pay your penalty immediately through secure, online transactions or phone using American Express, Discover, Diners Club, Master Card, and Visa.

**Online.** Pay.gov allows you to make secure online payments. To submit your payment online:

1. Log on to <https://www.pay.gov>.
2. Click on **Find an Agency** in the header menu.
3. Click on *Agriculture (USDA): Animal and Plant Health Inspection Service (APHIS)*.
4. Click on Continue under Animal and Plant Health Inspection Service (APHIS) Customers.
5. Click *Continue to the Form*.
6. Complete the required information.
  - a. If you are entering the payment but you are not the person named in the Settlement Agreement, type your name into the *Point of Contact* field, and type the name of the person or company named in the Settlement Agreement into the *Customer Name* field.
  - b. If you are the person named in the Settlement Agreement and you are making the payment, type your name and (if applicable) your company's name in the *Customer Name* field, and type the same names OR the name of a person who can access payment information into the *Point of Contact* fields.
  - c. In the *Service Provided By* dropdown menu, select **Penalty/Fine Payment** and enter your **Payment Document Number** IN210001-AC and Payment Amount (in U.S. Dollars).
  - d. Click *Submit Data*.
7. Enter payment information.
8. On the *Review and Submit* page, enter the e-mail address of the *Customer Name* or *Point of Contact* that you entered on a previous page, and courtesy copy **aphis.ies.cce@usda.gov**, and then submit your payment.
9. Save confirmation screen and/or confirmation e-mail as your receipt.

**Phone.** To make a credit card payment by phone:

1. Call 612-336-3243 and speak to a Debt Management Specialist and provide the following information, when requested:
2. State your **Payment Document Number** IN210001-AC.
3. State your credit card information.



If you are unable to pay online or by phone, you may do so by U.S. Mail using a check, cashier's check, or money order.

**U.S. Mail.** To make a payment by check, cashier's check, or money order:

1. Make the check, cashier's check, or money order payable to the Treasurer of the United States.
2. Write the **Payment Document Number** IN210001-AC in the notes section on your check, cashier's check, or money order.
3. Mail your payment to:  
USDA – APHIS – GENERAL IN210001-AC  
P.O. Box 979043  
St. Louis, MO 63197-9000

### **If You Are Unable To Pay In Full**

Complete the attached form and return it to our office to request a payment plan. Please be prepared to provide us with copies of your most recent federal tax return so that we may determine whether you are eligible for a payment plan.





## AGREEMENT TO PAY AND REQUEST FOR PAYMENT PLAN

If you agree with the terms in this Settlement Agreement but cannot pay the penalty in full at this time, select one of the options below, sign the form, and return it to the following address prior to the due date of **March 4, 2022**:

USDA, APHIS, IES (General) IN210001-AC  
4700 River Road, Unit 85  
Riverdale, MD 20737

I understand that by signing this Settlement Agreement, I waive my right to a hearing. I agree to pay the penalty of \$8,000, but I am requesting a payment plan because of financial hardship. I have enclosed a copy of my most recent federal tax return. I have indicated below if I have enclosed other documents to show financial hardship:

\_\_\_\_\_ Bankruptcy filing

\_\_\_\_\_ Other (describe):  
\_\_\_\_\_  
\_\_\_\_\_

Printed Name: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip code: \_\_\_\_\_