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October 16, 2023

Mr. Kevin Shea

USDA APHIS Administrator

Via: kevin.a.shea@usda.gov

Dr. Michael Watson

USDA APHIS Associate Administrator

Via: michael.t.watson@aphis.usda.gov

Dr. Roxanne Mullaney

USDA APHIS Deputy Administrator, Animal Care

Via: Roxanne.C.Mullaney@usda.gov

And via: aphis.customersupport@usda.gov

Re: Please take seriously — via additional fines, license suspension, or license revocation — the chronic, “critical,” and ongoing animal welfare violations at Wilstem Inc, in apparent and repeated violation of federal Animal Welfare Act

Dear Administrator Shea, Dr. Watson, Dr. Mullaney, and APHIS Animal Care Supervisory Team:

I am writing on behalf of nonprofit animal protection agency Lady Freethinker to implore your staff to take seriously the repeated, chronic, critical, and ongoing animal welfare violations at Wilstem Inc, in apparent and repeated violation of the federal Animal Welfare Act, the provisions of which you swore to uphold.

We are aware that the USDA recently fined Wilstem Inc (Customer No. 501298, License Certificate # 32-C-0265) \$8,000 in February 2022 for serious animal welfare violations — including a sick llama whose skull was crushed with an excavator bucket, an escaped eland who broke her neck in a botched recovery attempt, repeatedly unsupervised human-animal interactions, and an escaped kangaroo gone missing for at least two days before he was shot to death.



We thank you for taking some enforcement action regarding those horrific and preventable deaths. However, that fine is paltry compared to Wilstem Wildlife Park’s annual revenue of at least \$516,600, according to Dunn and Bradstreet’s database.

It also clearly was not enough for this licensee to improve conditions at the facility, as evidenced by ongoing violations, as [recently as July 2023](#) and as cited by your federal inspectors, that sadly mirror the documented history of violations at Wilstem.

The facility has amassed another “[Official warning](#)” and an additional 5 violations — two of them deemed “critical” — following Wilstem’s “settlement agreement” with APHIS. The violations include the preventable death of a Watusi calf [run over by a wagon](#) in the drive through “safari,” as well as a dying buffalo calf who was not checked by management for a reported 1-2 hours following reports of his distress — and who **died without any veterinary assessment, medical intervention, or a necropsy to determine the cause of death**, in seeming violation of APHIS rules for licensees.

During the July 2023 site visit, an inspector also noted an underweight 7yo giraffe named Marcello, detailed that staff’s comments that this skeletal animal was “more ideal” than he had been in the past, and concluded, “The allowance of the underweight condition of Marcello **shows a lack of understanding/knowledge in diet requirements and the ability to recognize proper giraffe condition.**”

The same report, however, notes that corrections were “already implemented” in the form of staggered lunch breaks that would allow staff to be present. This “correction” neither holds accountable those who were allowing this giraffe to starve, nor does it ensure that the veterinary and medical needs of this giraffe, or any other animal, will not be similarly neglected given staff who — per the inspector — lack the ability to recognize animal welfare or weight issues.

In light of the ongoing and serious violations, we urge APHIS to take significant and immediate enforcement action — **in the form of maximum fines, a license suspension, or a license revocation** — to immediately and permanently remedy the situation for animals at Wilstem.

Wilstem was among one of the top reoffenders detailed in a recent Lady Freethinker [investigation](#) into roadside attractions with histories of serious violations. In addition to the violations for which you fined Wilstem, we also obtained [affidavits](#) via a public records request to your agency that underscore serious concerns by the inspectors who have been tasked with ensuring Wilstem is in compliance — including comments from your staff that this facility has a





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history of lying to federal inspectors, not complying with inspectors' advice as to the welfare of animals, and trying to "hush up" animal deaths and mistreatment.

These affidavits point to tragic circumstances in addition to those detailed in inspection reports — including that of a donkey with a fractured leg and protruding bone being left to suffer overnight before being shot to death and the facility extending public interactions with animals — by more than 2 hours —after inspectors told the facility to decrease the animals' exposure to the visiting public for the animals' well-being.

In the words of your own inspectors, and as evidenced by the ongoing and critical violations: **"It appears the facility is not taking AC (Animal Care) concerns about animal handling seriously."**

It is critical that APHIS not allow this facility to continue exploiting and abusing animals with seeming impunity but rather that you uphold the mandates of the federal Animal Welfare Act to ensure that no more animals suffer for the sake of profit at this violative facility.

We look forward to your definitive response acknowledging receipt of this letter, as well as any planned review or enforcement action, by **October 23, 2023.**

Sincerely,

Nina Jackel
Founder- Lady Freethinker

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