



March 20, 2013

United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Animal Care
Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/494-7461

Lisa Limbert
894 E. Erie Ct
Gilbert, AZ 85295

Dear Ms. Limbert:

We have received and reviewed your letter regarding the February 25, 2013 inspection report for the November 20, 2012 routine inspection. I have evaluated your concerns and consider the citations to be valid; therefore the non-compliances cited on the inspection report issued 25 February 2013 will stand. Please note that the inspectors were following current program guidance regarding proper documentation of noncompliant items. While the statements on the inspection report appear to be factually correct, we will adjust the verbiage to clarify the potential animal impacts.

An amended version of this inspection report reflecting the aforementioned changes will be issued and sent via certified mail.

If you wish to appeal this determination, please know that if we do not hear from you within 30 days, the amended inspection report will be posted online at that time. Only the amended inspection report will be online; the original inspection report as well as the inspection report issued February 25, 2013 will no longer be valid.

Should you have any questions pertaining to this letter, or any other issues concerning the Federal Animal Welfare Act (AWA), please do not hesitate to contact us at the address above.

Sincerely,

(b)(6)(b)(7)(c)

Robert Gibbens, DVM
Director, Western Region
USDA, APHIS, Animal Care

86-C-0097
9 # 43456

04 March 2013

USDA, APHIS, ANIMAL CARE
2150 Centre Ave., Bldg. B
Mail Stop #3W11
Fort Collins, CO 80526-8117
Attn: Connie Morris

The 25 February 2013 report regarding the 20 November 2012 routine inspection for Customer ID 43456/Certificate 86-C-0097 includes some statements that are factually incorrect, speculative, or inflammatory. Objection is raised regarding the statements listed below (*italicized text*). The intent of this appeal is to request that the listed statements be removed from the report.

**Section 2.40 ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE
(DEALERS AND EXHIBITORS)**

The license does not have an appropriately completed written program of veterinary care; it is lacking information. Examples include:

- The last documented site visit by the Attending Veterinarian was on October 10, 2011. Regularly scheduled visits by the attending veterinarian are required to protect the health and welfare of the animals and give the attending veterinarian the opportunity to assess the health and welfare of the animals and the adequacy of the facilities.

"Animal Welfare Act and Animal Welfare Regulations" book does not specify the frequency of scheduled visits. The "Program of Veterinary Care for Research Facilities or Exhibitors/Dealers" form specifies that "A written program of adequate veterinary care between the licensee/registrant and the doctor of veterinary medicine shall be established and reviewed on an annual basis." As noted in the report, the last visit was on 10 October 2011 (i.e., during calendar year 2011). Licensee was in the process of transiting from one attending veterinarian to another veterinarian at the time of inspection. It was intended that Licensee would have a visit from the new attending veterinarian before the end of calendar year 2012, thereby fulfilling the annual requirement. Note: Inspection was in November, 2012, before the end of calendar year 2012.

- The Program of Veterinary Care is incomplete and does not contain sufficient detail. The written program only contains information regarding the ferret and this information is incomplete. In addition, it does not list all the covered species present at the facility. All covered animals present at the facility must be included on the written program of veterinary care to ensure that the licensee has adequate information to provide appropriate veterinary care to the animals as directed by the Attending Veterinarian.

The "Program of Veterinary Care for Research Facilities or Exhibitors/Dealers" does not contain enough space to list each species separately. Nowhere in "Animal Welfare Act and Animal Welfare Regulations" book or in the "Program of Veterinary Care for Research Facilities or Exhibitors/Dealers" form is it stated that each species must be listed separately. Attending Veterinarian chose to group similar species, in appropriate sections, as mustelidae, carnivores, rodents, etc. Only when needed to specify a particular species was that species called out individually (e.g., ferret, who required an additional lupron shot not required by any other carnivore).

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The licensee must ensure that an accurate and appropriately detailed written program of veterinary care is developed and maintained, and that the attending veterinarian conducts site visits on a regular basis.

For the reasons stated above, the program of veterinary care is believed to be accurate and appropriately detailed. For the reasons stated above, the attending veterinarian conducts regular site visits (at least once per calendar year).

3.27 (b) FACILITIES, OUTDOOR

Temperature and climate controls cannot be regulated at this outdoor location.

The guinea pigs were located on a covered patio, providing complete shade. Also, an evaporative cooler was used to provide external cooling, in addition to overhead fans. The evaporative cooler was in place at the time of inspection, but was not turned on at the time of the inspection due to the weather at the time of the November inspection. The evaporative cooler was called to the attention of the inspectors.

They could be exposed to temperature extremes and also predators both of which may be dangerous to their health and well-being.

The above sentence is speculative and inflammatory. As evidenced by their continued good health and well-being, the guinea pigs were not exposed to temperature extremes and were not exposed to predators. During the inspection, the inspectors should have observed that the enclosure was covered and that the covering was fastened to the sides of the enclosure with bungee cords.

3.33 (b) CLASSIFICATIONS AND SEPARATION

In addition the nutritional requirements for the two species [guinea pigs and rabbits] are different.

The above statement is factually incorrect. While guinea pigs cannot live on a pelleted food diet formulated for rabbits (no vitamin C), rabbits can live on a pelleted food diet formulated for guinea pigs (added vitamin C). Many commercially available foods exist that are sold for both guinea pigs and rabbits. Comparison of the ingredients and guaranteed analysis of commercially available pelleted guinea pig food and commercially available pelleted rabbit food, manufactured by the same company, shows they are virtually identical, aside from the vitamin C that is added to the guinea pig food¹. Both guinea pigs and rabbits also eat the fresh produce (fruits and vegetables) and timothy hay that was provided by Licensee.²

3.58 CLASSIFICATION AND SEPARATION

Animals can pass diseases between the species.

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- 1 Comparison of the ingredients and guaranteed analysis of Oxbow adult guinea pig food (<http://www.oxbowanimalhealth.com/products/type/detail?object=1622>) and Oxbow adult rabbit food (<http://www.oxbowanimalhealth.com/products/type/detail?object=1536>) shows the only differences are that the guinea pig food contains vitamin C that is not present in the rabbit food and the guinea pig food has a maximum crude fiber of 28% while the rabbit food has a maximum crude fiber of 29% (both contain the same minimum crude fiber).
 - 2 Produce is a source of vitamin C (among other vitamins and minerals) and timothy hay is a source of crude fiber.

The above statement is inflammatory. The above statement implies that Licensee mixed species without regard to potential health risks, which is false. Attending veterinarian observed these two species co-habiting without voicing a concern. Please note that Licensee is only objecting to the presence of the above statement in the report and is not challenging the reported violation.

In addition, the dietary requirements of the various species are different.

The above statement is factually incorrect. While guinea pigs cannot live on a pelleted food diet formulated for rabbits (no vitamin C), rabbits can live on a pelleted food diet formulated for guinea pigs (added vitamin C). Many commercially available foods exist that are sold for both guinea pigs and rabbits. Comparison of the ingredients and guaranteed analysis of commercially available pelleted guinea pig food and commercially available pelleted rabbit food, manufactured by the same company, shows they are virtually identical, aside from the vitamin C that is added to the guinea pig food³. Both guinea pigs and rabbits also eat the fresh produce (fruits and vegetables) and timothy hay that was provided by Licensee.⁴

Note: Patagonian caviaries are genetically similar to guinea pigs, sharing the same scientific family (Caviidae). The diet of Patagonian caviaries and guinea pigs is the same.

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- 3 Comparison of the ingredients and guaranteed analysis of Oxbow adult guinea pig food (<http://www.oxbowanimalhealth.com/products/type/detail?object=1622>) and Oxbow adult rabbit food (<http://www.oxbowanimalhealth.com/products/type/detail?object=1536>) shows the only differences are that the guinea pig food contains vitamin C that is not present in the rabbit food and the guinea pig food has a maximum crude fiber of 28% while the rabbit food has a maximum crude fiber of 29% (both contain the same minimum crude fiber).
- 4 Produce is a source of vitamin C (among other vitamins and minerals) and timothy hay is a source of crude fiber.



February 22, 2013

United States
Department of
Agriculture

Lisa Limbert
894 E. Erie Ct
Gilbert, AZ 85295

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Health Inspection
Service

Animal Care
Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/472-9558

Dear Ms. Limbert

This letter is provided in response to your appeal of the 29 January 2013 inspection report for the 20 November 2012 inspection of your facility (Customer ID 43456, Certificate 86-C-0097).

After review of your appeal, the non-compliant items on the inspection reports and supporting evidence were evaluated for appropriateness and consistency with the regulations and standards as contained in Title 9 of the Code of Federal Regulations, Chapter 1, Subchapter A (Title 9, CFR), and the circumstances of the inspection were discussed with both inspectors present on the inspection.

The following citations will remain on the report:

2.40-ATTENDING VETERINARIAN AND ADEQUATE VETERINARY CARE

(a) Each exhibitor shall have an attending veterinarian who shall provide adequate veterinary care to its animals in compliance with this section.

(1) Each exhibitor shall employ an attending veterinarian under formal arrangements. In the case of a part-time attending veterinarian or consultant arrangements, the formal arrangements shall include a written program of veterinary care and regularly scheduled visits to the premises of the exhibitor.

3.27-FACILITIES, OUTDOOR.

(b) Guinea pigs shall not be housed in outdoor facilities unless such facilities are located in an appropriate climate and prior approval for such outdoor housing is obtained from the Deputy Administrator

3.33-CLASSIFICATION AND SEPARATION.

(a) Guinea pigs shall not be housed in the same primary enclosure... with any other species of animals.

3.58-CLASSIFICATION AND SEPARATION.

(a) Rabbits shall not be housed in the same primary enclosure with any other species of animals unless required for scientific reasons.

In addition, you will receive an extension of sixty (60) days from the date of this correspondence to correct the non-compliant items cited on the report.

Based on the information contained within your correspondence and subsequent further internal inquiry, we have concluded that the inspectors did not appropriately follow Animal Care policy and communication procedures regarding completion of the inspection process with a thorough exit interview. Because of this procedural error, the remaining non-compliant items will be removed from this report since you were not given appropriate notice and guidance regarding these items. We apologize for any confusion or misunderstanding this situation may have created. Steps have been taken to ensure similar errors do not occur during future inspections. Please note, however, that

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Animal Care maintains that these areas are in fact non-compliant with regards to the Animal Welfare Act regulations and standards. If any of these or other non-compliances are found on future inspections, they may be cited at that time.

An amended version of this inspection report reflecting the aforementioned changes will be issued and sent via certified mail.

If you wish to appeal this determination to the Regional Director, please know that if we do not hear from you within 30 days, the amended inspection report will be posted online at that time. The amended report will replace the original inspection report online; the original inspection report will no longer be valid.

I hope this letter has satisfactorily addressed your concerns. If you have any further questions regarding the Animal Welfare Act and its regulations and standards or Animal Care's policies and procedures, please feel free to address them in writing at the above address.

Sincerely,

(b)(6)(b)(7)(c)

Tanya Tims, DVM
Supervisory Veterinary Medical Officer
USDA, APHIS, Animal Care- Colorado

Cc: W Striplin, ACI



Appeal of Inspection Report

On 28 January 2013, Lisa Limbert (Customer ID 43456, Certificate 86-C-0097) was presented with an inspection report prepared by Warren A Striplin, ACI (328121058220935).

On 29 January 2013, a new version of the inspection report was presented to Licensee which was identical to the original version except for slightly longer deadlines for corrections. This document addresses the 29 January 2013 version of the inspection report.

Licensee believes that most of the issues listed in the inspection report are inaccurate, misleading, inflammatory, or speculation not supported by evidence. This document contests most of the statements contained in the inspection report and is intended to be the basis for appeal of the inspection report and its contents.

Items in italicized font are from the inspection report. Responses are in plain font.

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

(a)(1) Only the ferret is included on the Written Program of Veterinary Care, while 22 species of covered animals are missing from the written program of veterinary care, including a beaver, a flying squirrel, 2 chipmunk, 2 bettongs, 6 Patagonian cavy, 4 pacas, a fruit bat, 6 guinea pigs, 9 rabbits, 2 fennec foxes, 2 sugar gliders, at least 3 cats, 5 skunks, 3 armadillo, a groundhog, 2 gophers, 1 cacomistle, 1 wallaby, 2 cuscus, 2 opossum and a striped possum.

Some of the animals listed above are never exhibited and are, therefore, cannot be required to be included in the program of veterinary care. Specifically, all domestic cats and the wallaby. There was only one cuscus. Attending Veterinarian listed vaccinations for "any mustelidae" (skunks and ferrets). Attending Veterinarian also lists treating "any rodent" (beaver, chipmunk, Patagonian cavy, pacas, guinea pigs, groundhog, and gophers) for ectoparasites.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

(a)(2) The exhibitor has not given the Attending Veterinarian the appropriate authorize to ensure the provision of adequate veterinary care and has not allowed him to oversee the adequacy of other aspects of animal care and use. Some examples include:

...the Attending Veterinarian was not consulted about the newborn Armadillo that was not thriving and subsequently died without benefit of veterinary examination to diagnose the animal and to provide an appropriate plan for treatment.

The statement that the newborn armadillo was "not thriving" is based on hindsight, not on information or evidence available at the time of birth or before the unfortunate death of the armadillo. Licensee cannot be faulted for not predicting that the newborn armadillo would die three days after birth. There is no reason to believe that Attending Veterinarian would have had any predictive abilities either.

(a)(2) The Attending Veterinarian was not involved in the development or assessment of an appropriate diet and

housing for the Fruit Bat to prevent nutritional issues and ensure healthy maturation.

Experts in the care, feeding, and housing of bats were consulted prior to and after the acquisition of the Egyptian fruit bat. These subject matter experts included:

1. Flying Fox Conservation Fund (<http://www.flyingfoxconservationfund.com>). USDA licensed (33-C-0384) source of the acquired Egyptian fruit bat. Provided dietary information and approved caging prior to shipment of Egyptian fruit bat.
2. Organization for Bat Conservation (<http://www.batconservation.org/>). USDA licensed (34-C-0117). Provided dietary and caging recommendations by email and telephone conversations.
3. Former, long-term (12 years) director of Lubee Foundation [Lubee Bat Conservancy] (<http://www.batconservancy.org/>). Lubee is USDA licensed (58-C-0778 and 58-R-0131). Provided scientifically researched and formulated diet, specific to a fruit bat. Also had several face-to-face meetings to discuss, clarify, and expand on information provided.

The combined bat-specific knowledge and experience of the above sources of information exceeds the bat knowledge and experience that an Attending Veterinarian would reasonably be expected to have.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

(b)(2) During the inspection, a hairless guinea pig was observed to have some abnormal patches of skin with reddened edges.... Subsequent to the inspection, when the guinea pig was examined and tested by the veterinarian, it was determined that the skin lesions were due to a fungal infection.

The use of the phrase "fungal infection" is technically correct, but is needlessly inflammatory. It is not uncommon for guinea pigs to develop skin conditions. Since these skin conditions are well known, it is typical to treat the potential causes one at a time. Licensee consulted with the operator of a guinea pig rescue center regarding the appropriate treatments which were underway at the time of the inspection. After the inspection, the Attending Veterinarian was consulted and, after being told the treatments that had already been tried and after charging the Licensee \$180, recommended the use of an over-the-counter anti-fungal intended for treatment of human athletes foot.

Wild rabbits from unknown sources and in unknown health conditions that are dropped off at the house for rehabilitation purposes are housed in close proximity with domestic rabbits and guinea pigs. The wild rabbits are not examined by the Attending Veterinarian before being added to the colony. Wild rabbits may carry diseases that may spread to other animals at the facility.

Licensee objects to the word "colony". Wild rabbits are never mingled with educational rabbits. Wild rabbits do not inhabit the same enclosures as educational rabbits. Wild rabbits do not come into contact with the same surfaces as educational rabbits. As pointed out during the inspection, wild rabbits are kept in incubators with primary air filtration inside the unit and secondary air filtration provided by a hospital-grade room air purifier.

During all previous inspections by the Attending Veterinarian, no concern was expressed about the

processes and procedures used to separate rehabilitation animals from exhibition animals. No prior USDA APHIS inspections indicated problems related to separation of rehabilitation animals from exhibition animals including a perfect USDA APHIS inspection report that was provided on 31 May 2012.

This is not a closed colony and has many exotic species brought in from various other facilities, yet there is no appropriate area to quarantine incoming animals.

Exotic species are brought in from other USDA licensed facilities. Health certificates are on file. Newly arrived exotic animals are kept in a separate room, apart from any other animals, for thirty days prior to being moved into areas that also house other species.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

(b)(3) The Licensee is not conveying timely and accurate information on problems of animal health, behavior, and well-being to the Attending Veterinarian. When a young armadillo died, the Licensee did not communicate anything to the Attending Veterinarian, nor inquire as to whether a necropsy was advisable.

Since the newborn armadillo was newborn, there would be no reason to believe that it had contracted any disease that could be communicated to other animals in the collection. A necropsy would have, at most, provided after-the-fact information about the cause of death that would not have prevented the death of the already deceased animal.

The Licensee did not communicate with the Attending Veterinarian regarding the skin problem on the hairless Guinea pig that subsequently was diagnosed as a fungal infection.

The use of the phrase "fungal infection" is technically correct, but is needlessly inflammatory. It is not uncommon for guinea pigs to develop skin conditions. Since these skin conditions are well known, it is typical to treat the potential causes one at a time. Licensee consulted with the operator of a guinea pig rescue center regarding the appropriate treatments which were underway at the time of the inspection. After the inspection, the Attending Veterinarian was consulted and, after being told the treatments that had already been tried and after charging the Licensee \$180, recommended the use of an over-the-counter anti-fungal intended for treatment of human athletes foot.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

2.131 HANDLING OF ANIMALS.

(c)(1) The animals are not always being handled in a manner that prevents risk to the animals or the viewing public.

—The Licensee indicated that a capybara named Collette had bitten the pant leg of a boy. The lack of sufficient distance and/or barriers between the animal and the viewing public put the boy at risk for injury.

USDA has no known definition of "sufficient distance and/or barriers". 2.131(c)(1) says, in full,

"During public exhibition, any animal must be handled so there is minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the animal and the general viewing public so as to assure the safety of animals and the public."

The phrase "minimal risk" is used in the USDA APHIS book and is reasonable. Slightly biting the leg of a pair of pants can be reasonably be considered "minimal risk". The day after this incident occurred, the capybara was removed from Licensee's wildlife education program and was transferred to another facility. This situation, minimal though it may be, will never again be possible.

Other factors of significance:

1. The capybara was a young animal -- not a full-grown adult. A young capybara is not able to inflict injury to the same extent as an adult.
2. The mother of the boy publicly stated that no harm was done. The boy returned to Licensee's classes many times after the incident. Nobody involved believes that this incident was significant, although (as stated above) the animal was immediately removed from future educational programs.

—A newborn Armadillo accompanied the Licensee on venues before dying at approximately one week old. Excess handling stresses newborns and may have contributed to the Armadillo's death.

Statement that the newborn armadillo was subjected to excess handling is pure speculation. Linking potential handling stress to the death of the animal without evidence is inflammatory. The newborn armadillo was only transported outside of Licensee's house on one occasion: It was taken to the facility where a previously scheduled wildlife education class was conducted, so that it could be fed and kept warm after it had been clearly rejected by its mother. The feeding was done after the class was concluded and the students had left.

It is believed that this item was included in the inspection report because of a picture of the newborn armadillo that was posted on Licensee's Facebook page. The picture was taken in Licensee's house, not at the site of the wildlife education class. Facebook pictures can be taken at any time and any place. Facebook pictures can be posted by the owner of the page or can be posted, on the Facebook owner's page, by other Facebook users. Facebook posting should never be interpreted without fully understanding the circumstances of the posting and the source of the posted material.

—The licensee has stated that children are allowed to pick up rabbits. The rabbits could become stressed or harmed or the children injured if the rabbits are handled incorrectly.

This statement is incorrect. To minimize risk or harm for both the rabbits and the children, if rabbits are held, the rabbits are placed in a pouch by Licensee prior to being held by students. Children hold the rabbits on their laps inside the pouches as shown in picture below.



Correct by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.25 FACILITIES, GENERAL.

(c) Storage

--Supplies of food and bedding are not being stored in a manner that protects against spoilage, deterioration, or infestation or contamination by vermin. There is an open bag of food and an open bag of shavings that is used as bedding for both the guinea pigs and the rabbits.

We had every reason to believe that we were adequately storing these products. It was reasonable to assume that bags of bedding and commercially-available food that was still in the packaging in which it was purchased and inside our home met the requirement in 3.25(c) that "Food supplies shall be stored in containers with tightly fitting lids or covers or in the original containers as received from the commercial sources of supply" (emphasis added for effect). Nevertheless, newly opened bags of food and shavings are now placed in closed containers with tightly fitting lids or covers after being opened for use in feeding or bedding preparation.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.26 FACILITIES, INDOOR.

(d) Interior surfaces.

--The interior building surfaces of the indoor housing facilities used to house the 8 Guinea Pigs are not constructed and maintained so that they are substantially impervious to moisture and may be readily sanitized.

This statement is not correct. Licensee has, on file, a written statement by the custom enclosure builder which states, in part, that:

"The other cages I [C & C Cages] made are either sealed with paint, stain / varnish or wax or a combination thereof and lined with some type of liner depending on the animal to be housed....This is done to protect the wood and allow for cleaning / sanitizing."

Some cages are lined with Coroplast® sheets. The web site for the manufacturer of Coroplast describes this product as "Coroplast is ideal for indoor and outdoor applications. It is tougher than corrugated fiberboard and lighter than extruded plastic sheet. It is waterproof and stain-resistant."¹ (emphasis added for effect).

There is carpet below the Guinea Pigs enclosure, a couch at the back of the enclosure and drapes in the room.

3.26(d) does not address the materials that may or may not be below, behind, or in the same room as animal caging.

Many of the primary enclosures used for housing various animal species in the room and throughout the house contain unsealed wood that is not impervious to moisture.

The above statement is incorrect. Licensee has, on file, a written statement by the custom enclosure builder which states, in part, that:

"The other cages I [C & C Cages] made are either sealed with paint, stain / varnish or wax or a combination thereof and lined with some type of liner depending on the animal to be housed....This is done to protect the wood and allow for cleaning / sanitizing."

Some cages are lined with Coroplast® sheets. The web site for the manufacturer of Coroplast describes this product as "Coroplast is ideal for indoor and outdoor applications. It is tougher than corrugated fiberboard and lighter than extruded plastic sheet. It is waterproof and stain-resistant."² (emphasis added for effect).

To be corrected by 2-12-2013. The report was provided on 29 January 2013 -- ten business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.28 PRIMARY ENCLOSURES

(a)(1)

--The primary enclosures containing the 8 Guinea Pigs are not constructed of a material substantially impervious to liquids and moisture.

The above statement is incorrect. Licensee has, on file, a written statement by the custom enclosure builder which states, in part, that:

"The 2 story frame that the C & C Cages were contained in were at no time accessible to the animals and were sealed prior to delivery with either stain or wax or painted to protece [sic] the wood from the elements."

"The other cages I made are either sealed with paint, stain / varnish or wax or a combination thereof and lined with some type of liner depending on the animal to be housed....This is done to protect the wood and allow for cleaning / sanitizing."

Some cages are lined with Coroplast® sheets. The web site for the manufacturer of Coroplast describes this product as "Coroplast is ideal for indoor and outdoor applications. It is tougher than corrugated fiberboard and lighter than extruded plastic sheet. It is waterproof and stain-resistant."³

1 <http://www.coroplast.com/catalog/coroplast/>

2 <http://www.coroplast.com/catalog/coroplast/>

3 <http://www.coroplast.com/catalog/coroplast/>

(emphasis added for effect).

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.29 FEEDING

(d)

--When asked, the licensee indicated that the food receptacles for the 8 guinea pigs are not being sanitized at least once every 2 weeks. She is cleaning the food receptacles, but not sanitizing them.

The definition of "sanitizing" may have been unclear. Food receptacles are cleaned in a dishwasher at least once every two weeks. The dishwasher subjects the food receptacles to both cleaning substances and to high temperatures, both of which combine to sanitize the food receptacles.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.30 WATERING

--The water receptacles are not being sanitized at least once every 2 weeks.

The definition of "sanitizing" may have been unclear. Food receptacles are cleaned in a dishwasher at least once every two weeks. The dishwasher subjects the food receptacles to both cleaning substances and to high temperatures, both of which combine to sanitize the food receptacles.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.31 SANITATION

--Virtually every wall-ceiling junction and wall-wall junction in the housing areas are covered with evidence of pests such as spiders and spider webs. The licensee states she has not removed the spider webs this year, nor attempted any other means of pest control for the spiders.

Technically correct, but misleading. Licensee's husband frequently removes spider webs. To avoid harming the animals, Licensee's husband periodically applies a commercially-available, pyrethrin-based (0.5% Pyrethrins, 5% Piperonyl Butoxide) spray as a pest prevention mechanism.

The spiders did not pose any threat to the animals. Webs at the height of high and/or vaulted ceilings were not near any of the animals.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.53 PRIMARY ENCLOSURES

(c)(2)

--The interior height of the lower outdoor cage containing rabbits on the patio was only approximately 13 inches in height when measured and does not meet the minimum required height of 14 inches.

The reported measurements are incorrect. The outdoor cage was dismantled after the inspection, so it cannot be photographed. The cage's height came from walls which were made from fourteen-inch panels, one of which is shown in the following picture.



To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.54 FEEDING

(b)

--When asked, the licensee indicated that the food receptacles for the 9 rabbits are not being sanitized at least once every 2 weeks. She is cleaning the food receptacles, but not sanitizing them.

The definition of "sanitizing" may have been unclear. Food receptacles are cleaned in a dishwasher at least once every two weeks. The dishwasher subjects the food receptacles to both cleaning substances and to high temperatures, both of which combine to sanitize the food receptacles.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.55 WATERING

--The water receptacles are not being sanitized at least once every 2 weeks. The licensee indicated that she had been cleaning, but not sanitizing the watering receptacles for the 9 rabbits.

The definition of "sanitizing" may have been unclear. Water bowls are cleaned in a dishwasher at least once every two weeks. The dishwasher subjects the food receptacles to both cleaning substances and to high temperatures, both of which combine to sanitize the food receptacles. Water bottles are cleaned with a bleach/water solution.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.58 CLASSIFICATION AND SEPARATION

(a)

In addition, the dietary requirements of the various species are different.

No rabbits are currently being housed with guinea pigs. That being said, commercially-available rabbit food and commercially-available guinea pig food are identical with one exception: guinea pig food contains vitamin C while rabbit food does not. Vitamin C from guinea pig food does not adversely affect rabbits, so rabbits can consume guinea pig food as part of their diet. Raw fruits and vegetables are also fed to both rabbits and guinea pigs.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.128 SPACE REQUIREMENTS

--The 22 1/2 D x 35 W x 24 H enclosure space provided for the young fruit bat is not adequate to allow for normal postural and social adjustments such as flying. The licensee shall provide sufficient unobstructed space in the enclosure to allow the bat to make normal postural adjustments to include unrestricted flying.

USDA APHIS does not have housing guidelines for Egyptian fruit bats. It is, therefore, not appropriate to make unsubstantiated statements regarding the adequacy of the provided caging. The State of Arizona's Game & Fish Department program administrator inspected the existing caging and determined that it was appropriate for the size of the bat. The following pictures clearly show that the bat has sufficient unobstructed space in the enclosure to all for unrestricted flying.



--Other animals at the facility also lack appropriate enclosure construction to allow for their normal postural and social adjustments with adequate freedom of movement. Examples include a beaver that does not have water in which to swim and 3 armadillos, 2 prairie dogs, a groundhog, and 2 gophers that do not have substrates that allow space for burrowing behaviors.

Licensee has, on file, a letter from Attending Veterinarian which states: "And I agree that since the beaver is unable to produce the oils that would normally help waterproof his pelage, giving him a large pool or pond to play or swim in would potentially be deleterious to his health."

Regarding the other animals listed, Licensee is extremely offended at the allegation that Licensee has not provide the armadillos, prairie dogs, and gophers with substrates that allowed for burrowing. Instead, Licensee went to great lengths and expense to have custom enclosures built that provided for complete containment of deep substrates of non-aromatic wood shavings for burrowing.

The groundhog has both a dark, "nest box" in her enclosure and is given supervised time outdoors for exploration and other enrichment behaviors. The groundhog enclosure includes an oversized exercise wheel and a multi-level habitat.

To be corrected by 2-12-2013. The report was provided on 29 January 2013 -- ten business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.

3.132 EMPLOYEES

—At the time of this inspection there was only one full time person at this facility that was involved in the daily care and husbandry for the 23 species including 62 animals in all at this location. There were numerous non-compliances observed on this inspection related to husbandry and animal care. There must be a sufficient number of adequately trained employees to provide and maintain the professionally acceptable level of husbandry practices required of this subpart.

This document disagrees with virtually all of the alleged non-compliances contained in the inspection report and contests them. The above statement implies that the alleged non-compliances would be rectified with the addition of employees. There is no evidence that this implication is valid.

Also, there are not 62 animals at this location. The count of animals in the report appears to include every animal that was in the collection at the time of the inspection as well as animals that were intended to be obtained in the future and ignores animals that were identified, during the inspection as intended to be transferred to other USDA facilities. There are currently 48 animals that are covered by USDA APHIS license 86-C-0097.

To be corrected by 2-05-2013. The report was provided on 29 January 2013 -- five business days before the correction is expected to be made. This is not a sufficient or reasonable amount of time to make a correction.



**United States
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Animal Care

EXPIRATION DATE: NOVEMBER 10, 2010

This is to certify that LISA LIMBERT

is a licensed CLASS C EXHIBITOR
under the

Animal Welfare Act
(7 U.S.C. 2131 et seq.)

Certificate No. 86-C-0097

Customer No. 43456

[REDACTED]

Deputy Administrator



EXPIRATION DATE: NOVEMBER 10, 2013

**United States
Department of
Agriculture**

**Marketing and
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**Animal and
Plant Health
Inspection
Service**

Animal Care

This is to certify that

LISA LIMBERT

is a licensed
under the

CLASS C EXHIBITOR

Animal Welfare Act

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

Certificate No.

86-C-0097

Customer No.

43456



Deputy Administrator

Attention: Evelyn

Lisa Limbert USDA # 86-C-0097
894 East Erie Court
Gilbert, Arizona 85295
480-963-2483

#3 NA #4 NA #9 Lisa Limbert same as #1 owner #13 owner

Rodents

4 pacas
1 groundhog
2 prairie dogs
6 Patagonian caviars
1 beaver
2 chipmunk
1 flying squirrel
Total 17

Canines

2 Fennec foxes

Wild or Exotic Mammals

2 cuscus
2 opossum
1 fruit bat
2 striped skunks
2 spotted skunks
1 hog nose skunk
2 sugar gliders
1 striped possum
1 wallaby
1 ring tail cat
2 bettongs
3 armadillos
1 ferret
Total 21

9 Rabbits

8 Guinea pigs

Total animals on page 17 +2+21+9+8= 57

(b)(6)

10/24/2012

OCT 24 2012



United States
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Animal and Plant
Health Inspection
Service

Animal Care
Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/494-7461

RE: ACKNOWLEDGEMENT OF RENEWAL

Certificate Number: 86-C-0097

Renewal Date: 11/10/2013

October 24, 2012

Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

Thank you for submitting your Animal Welfare Act (AWA) license renewal documents and applicable fees. Enclosed is a copy of the renewal form and a new certificate indicating that your AWA license has been renewed for another year.

As a reminder, you should file your application for renewal and pay your licensing fees on or before the expiration date each year. We will send you a renewal notice again next year about 60 days before the expiration date of your license. If you cease conducting regulated activities, you may cancel your license at any time by notifying us, in writing, that you wish to terminate your license.

The law also requires that you notify us, by certified mail, of any change in the name, address, location, management and control or ownership of your business within 10 days after such a change has occurred.

Please be advised that your facility records must be kept current and they are subject to review by APHIS Officials during compliance inspections. You may order record keeping forms from this office free of charge.

Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A. Striplin, A.C.I.

Enclosures



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Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/494-7461

RE: LICENSE RENEWAL
Certificate Number: 86-C-0097
Renewal Date: 11/10/2012

August 30, 2012
Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

This is to remind you that your U.S. Department of Agriculture (USDA) Animal Welfare Act (AWA) license is due for renewal on or before the above renewal date. This is the only renewal notice you will receive.

Please complete the enclosed application form, making any necessary corrections to the pre-printed information, and return it to the above address, along with the appropriate license renewal fee. The annual fee is calculated by using the enclosed fee schedule. You may pay by cashier's check, certified check, personal check or money order made payable to the United States Department of Agriculture. You can also pay with a Visa or MasterCard, using the enclosed credit card authorization form. However, we cannot accept cash payments.

Please note that you must have an approved, complete, and up-to-date program of veterinary care form on file at your place of business. You can obtain blank forms -- or any others you may need -- directly from this office or your USDA inspector. The AWA also requires that you report to us any changes in your name, address, location, management, control or ownership of your business via certified mail within 10 days after the change has occurred.

It is very important that you file your AWA license renewal application before the expiration date. Any renewal notices received after that date will be considered invalid and returned. Accordingly, to continue to conduct AWA regulated business, it would be necessary for you to reapply and undergo the entire pre-licensing process. If your license expires and you continue to operate as a dealer or exhibitor, you will be in violation of the AWA and subject to legal action.

Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

Robert M Gibbens, D V M
Regional Director -- Animal Care

cc: Warren A Striplin, A.C.I.

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EXPIRATION DATE: NOVEMBER 10, 2012

This is to certify that

LISA LIMBERT

is a licensed
under the

CLASS C EXHIBITOR

Animal Welfare Act


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

Certificate No.

86-C-0097

Customer No.

43456


Deputy Administrator



United States
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Animal Care
Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/494-7461

RE: ACKNOWLEDGEMENT OF RENEWAL

Certificate Number: 86-C-0097

Renewal Date: 11/10/2012

September 19, 2011

Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

Thank you for submitting your Animal Welfare Act (AWA) license renewal documents and applicable fees. Enclosed is a copy of the renewal form and a new certificate indicating that your AWA license has been renewed for another year.

As a reminder, you should file your application for renewal and pay your licensing fees on or before the expiration date each year. We will send you a renewal notice again next year about 60 days before the expiration date of your license. If you cease conducting regulated activities, you may cancel your license at any time by notifying us, in writing, that you wish to terminate your license.

The law also requires that you notify us, by certified mail, of any change in the name, address, location, management and control or ownership of your business within 10 days after such a change has occurred.

Please be advised that your facility records must be kept current and they are subject to review by APHIS Officials during compliance inspections. You may order record keeping forms from this office free of charge.

We appreciate your efforts in complying with the Animal Welfare Act. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A. Striplin, A.C.I.

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Ft. Collins, CO 80526
Phone: 970/494-7478
Fax: 970/494-7461

RE: LICENSE RENEWAL
Certificate Number: 86-C-0097
Renewal Date: 11/10/2011

September 1, 2011
Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

This is to remind you that your U.S. Department of Agriculture (USDA) Animal Welfare Act (AWA) license is due for renewal on or before the above renewal date. This is the only renewal notice you will receive.

Please complete the enclosed application form, making any necessary corrections to the pre-printed information, and return it to the above address, along with the appropriate license renewal fee. The annual fee is calculated by using the enclosed fee schedule. You may pay by cashier's check, certified check, personal check or money order made payable to the United States Department of Agriculture. You can also pay with a Visa or MasterCard, using the enclosed credit card authorization form. However, we cannot accept cash payments.

Please note that you must have an approved, complete, and up-to-date program of veterinary care form on file at your place of business. You can obtain blank forms -- or any others you may need -- directly from this office or your USDA inspector. The AWA also requires that you report to us any changes in your name, address, location, management, control or ownership of your business via certified mail within 10 days after the change has occurred.

It is very important that you file your AWA license renewal application before the expiration date. Any renewal notices received after that date will be considered invalid and returned. Accordingly, to continue to conduct AWA regulated business, it would be necessary for you to reapply and undergo the entire pre-licensing process. If your license expires and you continue to operate as a dealer or exhibitor, you will be in violation of the AWA and subject to legal action.

We appreciate your efforts in complying with the Animal Welfare Act. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M Gibbens, D V M
Regional Director – Animal Care

cc: Warren A Striplin, A.C.I.

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EXPIRATION DATE: NOVEMBER 10, 2011

This is to certify that

LISA LIMBERT

is a licensed
under the

CLASS C EXHIBITOR

Animal Welfare Act


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

Certificate No.

86-C-0097

Customer No.

43456

A large black rectangular box redacting the signature of the Deputy Administrator. To the right of the box, the text "(b)(7)(D)(9)(9)(9)" is printed vertically.

Deputy Administrator

894 E Erie Court
Gilbert, AZ 85295
01 November 2010

Dear USDA,

The enclosed check is the balance of my renewal fees for license number 86-C-0097, renewal date 11/10/2010, customer ID number 43456.

I am sending this check because I misunderstood a charge made to my credit card in September, 2010, and assumed it was a renewal fee for 2010, instead of 2009.

A few days ago, I mailed a check for \$10 (thought to be the balance between the September, 2010, credit card charge and the renewal fee).

Sincerely,

(b)(6)

A large black rectangular redaction box covers the signature area.

Lisa Limbert

NOV 04 2010



United States
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Agriculture

Animal and Plant
Health Inspection
Service

Animal Care
Western Region

2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970-494-7461

RE: ACKNOWLEDGEMENT OF RENEWAL

Certificate Number: 86-C-0097

Renewal Date: 11/10/2011

November 5, 2010

Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

Thank you for submitting your Animal Welfare Act (AWA) license renewal documents and applicable fees. Enclosed is a copy of the renewal form and a new certificate indicating that your AWA license has been renewed for another year.

As a reminder, you should file your application for renewal and pay your licensing fees on or before the expiration date each year. We will send you a renewal notice again next year about 60 days before the expiration date of your license. If you cease conducting regulated activities, you may cancel your license at any time by notifying us, in writing, that you wish to terminate your license.

The law also requires that you notify us, by certified mail, of any change in the name, address, location, management and control or ownership of your business within 10 days after such a change has occurred.

Please be advised that your facility records must be kept current and they are subject to review by APHIS Officials during compliance inspections. You may order record keeping forms from this office free of charge.

We appreciate your efforts in complying with the Animal Welfare Act. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A. Striplin, A.C.I.

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Fax: 970/494-7461

RE: LICENSE RENEWAL
Certificate Number: 86-C-0097
Renewal Date: 11/10/2010

September 2, 2010
Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

This is to remind you that your U.S. Department of Agriculture (USDA) Animal Welfare Act (AWA) license is due for renewal on or before the above renewal date. This is the only renewal notice you will receive.

Please complete the enclosed application form, making any necessary corrections to the pre-printed information, and return it to the above address, along with the appropriate license renewal fee. The annual fee is calculated by using the enclosed fee schedule. You may pay by cashier's check, certified check, personal check or money order made payable to the United States Department of Agriculture. You can also pay with a Visa or MasterCard, using the enclosed credit card authorization form. However, we cannot accept cash payments.

Please note that you must have an approved, complete, and up-to-date program of veterinary care form on file at your place of business. You can obtain blank forms -- or any others you may need -- directly from this office or your USDA inspector. The AWA also requires that you report to us any changes in your name, address, location, management, control or ownership of your business via certified mail within 10 days after the change has occurred.

It is very important that you file your AWA license renewal application before the expiration date. Any renewal notices received after that date will be considered invalid and returned. Accordingly, to continue to conduct AWA regulated business, it would be necessary for you to reapply and undergo the entire pre-licensing process. If your license expires and you continue to operate as a dealer or exhibitor, you will be in violation of the AWA and subject to legal action.

We appreciate your efforts in complying with the Animal Welfare Act. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director -- Animal Care
Western Region

cc: Warren A. Striplin, A.C.I.

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2150 Centre Ave.
Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970-494-7478

RE: NEW LICENSE APPROVAL
Certificate Number: 86-C-0097
Renewal Date: 11/10/2010

November 10, 2009
Customer ID Number: 43456

Lisa Limbert
894 E. Erie Court
Gilbert, AZ 85295

Dear Licensee:

We are pleased to inform you that you have met the licensing requirements under the Animal Welfare Act (AWA). Accordingly, we are enclosing a copy of your approved application (APHIS Form 7003A), along with the official license certificate, which is suitable for display.

Please note the license expiration date; each year, you are required to submit your license renewal application and renewal fees on or before the expiration date. The appropriate forms and instructions will be sent to you at least 60 days prior to the expiration date -- this will serve as the sole reminder that your license is nearing expiration.

In addition to maintaining your facility and animals in accordance with the AWA regulations and standards, you must keep current, accurate records -- including a written program of veterinary care. We have enclosed a supply of forms to assist you in maintaining your records in the prescribed manner. You must also notify this office by certified mail of any change of name, address, management, or substantial control or ownership of your business within 10 days of the change.

We appreciate your efforts in complying with the Animal Welfare Act. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director -- Animal Care
Western Region

cc: Warren A Striplin, A.C.I.
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Building B
Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970/494-7461

RE: ANNUAL LICENSE FEES

November 2, 2009

Customer ID Number: 43456

Lisa Limbert

Business Address: 894 E. Erie Court
Gilbert, AZ 85295 County: Maricopa

Dear Applicant:

We are pleased to inform you that your U.S. Department of Agriculture (USDA) inspector has found your facility to be in compliance with the Animal Welfare Act (AWA), regulations and standards.

We will send you your new license after we have received the \$225.00 annual fees based on information reported in your original application form. To avoid delaying the licensing process it is necessary that you pay your fees within 20 days of receipt of this letter. Your fees may be paid by cashier's check, certified check, personal check, or money order, made payable to the U.S. Department of Agriculture. You may also pay with a Visa or Master Card using the enclosed credit card authorization form. We cannot accept cash payments. Please be advised that you cannot legally conduct AWA activities until you receive your license certificate. Thank you for your prompt attention to this matter.

Please feel free to contact this office at (970) 494-7478 if you have any questions regarding this letter.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A Striplin, A.C.I.

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Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970/494-7461

September 1, 2009

VMO/ACI:
Warren A Striplin, A.C.I.

The following individual has submitted his/her application and application fee. He/she is ready for a pre-licensing inspection:

Customer ID Number: 43456

Telephone: (480)-963-2483

Lisa Limbert

Business Address: 894 E. Erie Court
Gilbert, AZ 85295 County: Maricopa
Site Address: 894 E. Erie Court
Gilbert, AZ 85295 County: Maricopa

Accordingly, please contact him/her within the next 10 days to schedule a pre-licensing inspection.

Please be advised that the applicant's Program of Veterinary Care (PVC) must also be reviewed during the pre-licensing inspection. The facility cannot be considered in compliance without an acceptable PVC. When applicable, the exercise plan and environment enhancement plans should also be reviewed.

When inspecting an applicant for an exhibitor's license, verify that the correct numbers of covered animals are on the application form. In addition please indicate the total number of covered animals on the Inspection Report. If you discover an error on any application form, don't make changes on the form, but have the applicant complete and sign a new form. When doing so, be sure to transfer the applicants' customer number in the upper right hand corner of the application. When the facility is in compliance, please ensure a license fee of \$225.00 is submitted.

The application is enclosed. Please report your findings to us on an Inspection Report as soon as possible after completion of the pre-licensing inspection. Thank you in advance for your cooperation.

Contact this office at (970) 494-7478 if you have any questions regarding this letter.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

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2150 Centre Ave.
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Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970/494-7461

RE: AWA LICENSE APPLICATION

September 1, 2009

Customer ID Number: 43456

Lisa Limbert

Business Address: 894 E. Erie Court
Gilbert, AZ 85295 County: Maricopa

Dear Applicant:

We recently received and processed your application for a USDA license under the Animal Welfare Act (AWA). The USDA inspector for your area will be contacting you soon to conduct a pre-licensing inspection of your facility. As we mentioned in our earlier correspondence to you, we will issue you a license to conduct AWA regulated activities when you have completed the licensing process by passing a pre-licensing inspection and fulfilling all other applicable requirements.

We hope this information is helpful, and we look forward to hearing from you. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A Striplin, A.C.I.

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Mail Stop # 3W11
Ft. Collins, CO 80526
Phone: 970-494-7478
Fax: 970/494-7461

RE: USDA LICENSE INFORMATION

July 28, 2009

Customer ID Number: 43456

Lisa R Limberg

Business Address: 894 E. Erie Court
Gilbert, AZ 85295 County: Maricopa

Dear Applicant:

Thank you for your interest in obtaining a license from the U.S. Department of Agriculture (USDA) to conduct activities regulated under the Animal Welfare Act (AWA). As you requested, we have enclosed the appropriate information and forms, including copies of the AWA regulations and standards. As you will note, the different classes for licensing are outlined on Page 20 of the AWA regulations (9CFR, Part 1, Section 1.1). If your operation meets the definition of a Class A, B, or C licenses, please complete the enclosed application (APHIS Form 7003A) and return it to the above address, along with a \$10 check, money order or credit card authorization in payment of the non-refundable application fee. We cannot accept cash payments.

In addition, you must have your veterinarian complete and sign the enclosed program of veterinary care (PVC) form; you must also sign this form. Keep the completed PVC with your facility records, which will be reviewed by your USDA Inspector. Please do not send the completed PVC form to this office.

One of our field inspectors will contact you to schedule a pre-licensing inspection of your facility following receipt of your application and the \$10.00 fee. Once your facility and records are in compliance with all AWA regulations and standards, you will be asked to pay an annual license fee. We will issue a license after all the necessary documentation and inspections have been completed and the necessary fees paid.

The licensing process must be completed within 90 days after your initial pre-license inspection. If, after the initial inspection, your facility is not in compliance with the AWA regulations and standards, you will be allowed two additional inspections within the 90-day period. If your facility is still not in compliance by the 3rd inspection or the 90-day period has elapsed, your application will be denied and you must wait 6 months before reapplying.

We hope this information is helpful, and we look forward to hearing from you. Contact this office at (970) 494-7478 if you have any questions regarding this letter or the Animal Welfare Act.

Sincerely,

(b)(6)(b)(7)(c)

Robert M. Gibbens, D V M
Regional Director – Animal Care
Western Region

cc: Warren A Striplin, A.C.I.

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INFO/APP KIT REQUEST

CUSTOMER #:

43456

CURRENT LICENSE/REGISTRATION#: _____

NAME

Lisa Limberg

PHONE:

480-963-2483

BUSINESS NAME

East Valley Wildlife

PHONE: _____

MAILING ADDRESS

894 E Erie Ct.

CITY

Gilbert

STATE

AZ

ZIP

85295

COUNTY:

Maricopa

PHYSICAL ADDRESS/ACTUAL LOCATION OF ANIMALS (SITE)

ADDRESS

Same

CITY

STATE

ZIP

COUNTY

TYPE OF ANIMALS

Skunk

LICENSE TYPE: (circle one) A (breeder) B (dealer) C (exhibitor) R (research facility)

T (carrier) H (intermediate handler)

APP KIT TYPE: (circle one) Breeder/Broker Exhibitor Registration

PREVIOUS APPLICATION? (check one) ☒ Yes ☒ No

NOTES:

RECEIVED BY

LWS

DATE

28-Jul-09

FILLED BY

EMC

DATE

7-28-09



USDA, APHIS, Animal Care
ANIMAL WELFARE COMPLAINT

Complaint No. FY#W13-019	Date Entered 2-Nov-12	Received By EMC
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Referred To Tanya Tims, DVM, SACS	Reply Due
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Facility or Person Complaint Filed Against

Name Lisa Limbert	Customer/License/Registration No. 86-C-0097/#43456
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Address 894 E. Erie Court			
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City Gilbert	State AZ	Zip 85295	Phone No 480-963-2483
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Complainant

Name Amanda Lollar	Organization Bat World Sanctuary, Inc.
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Address N/A			
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City N/A	State N/A	Zip N/A	Phone No./Email address 940-325-3404 sanctuary@batworld.org
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How was complaint received?

email

Details of Complaint: Purchased a fruit bat feeds the animals flavored tums and yoguart. Housing the bat in a dog kennel. Will display this bat for educational purposes.

Results: **** On November 21, 2012 Animal Care VMO Dr. Judy Davis and myself conducted a full inspection at Lisa Limbert's facility on Erie Court in Gilbert, AZ to follow up on the allegations presented in this complaint. An inspection report has also been prepared.

Application packet provided? Yes ☐
No ☒


INSPECTOR
Warren A. Striplin

DATE
24-Jan-13

REVIEWED BY

DATE

(b)(6)(b)(7)(c)



Celli, Evelyn M - APHIS

To: sanctuary@batworld.org
Subject: FW: Formal complaint about "Lisa's Creatures" - corrected attachment
Attachments: LisasCreatures-facebook posts.pdf

November 2, 2012

Amanda Lollar
Bat World, Sanctuary, Inc.
sanctuary@batworld.org

Dear Complainant:

Thank you for your emailed letter dated October 28, 2012 concerning Lisa Limbert/Lisa's Creatures. Your concern has been issued number #W13-019. If you wish to know the results of our findings, you must send a request, in writing, to our Freedom of Information Act office. Depending on the circumstances of the situation, please allow us enough time (30 to 60 days) to thoroughly investigate your concerns.

FOIA requests can be submitted three ways--

1. Email: foia.officer@aphis.usda.gov
2. Fax: 301-734-5941
3. US Mail: USDA, APHIS, FOIA
4700 River Road, Unit 50
Riverdale, MD 20723

Animal Care is the division of the U.S. Department of Agriculture (USDA) that is responsible for the enforcement of the Animal Welfare Act. The Act provides minimum standards for the humane care and use of animals at USDA licensed or registered facilities.

Animal Care inspectors conduct routine unannounced inspections at all USDA licensed and registered facilities to ensure that they are meeting or exceeding these minimum standards. Our inspectors also conduct searches for unlicensed facilities conducting regulated activities. We perform inspections and searches when necessary in response to valid concerns and complaints received from the public to ensure the well-being of the animals and compliance with the law. If violations are found, enforcement action appropriate for the circumstances will be initiated.

Please be assured that we will look into your concerns and take appropriate action if necessary.

Thank you for your interest in the welfare of these animals.

Sincerely,
/S/
Robert Gibbens, DVM
Director, Western Region
USDA, APHIS, Animal Care

Celli, Evelyn M - APHIS

From: AC West
Sent: Monday, October 29, 2012 2:03 PM
To: Celli, Evelyn M - APHIS
Subject: FW: Formal complaint about "Lisa's Creatures" - corrected attachment
Attachments: LisasCreatures-facebook posts.pdf

From: Bat World Sanctuary [mailto:sanctuary@batworld.org]
Sent: Sunday, October 28, 2012 3:39 PM
To: ACE; AC West
Cc: cyr5@cdc.gov
Subject: Formal complaint about "Lisa's Creatures" - corrected attachment

Dear USDA and Dr. Charles Rupprecht,

I am writing in concern regarding a USDA permitted individual, Lisa Limbert of Lisa's Creatures (permit # 86-C-0097). As seen in the attached PDF which contains posts Ms. Limbert has written on her Facebook page, she provides "educational" programs to children, and encourages the children to handle, pet, brush and decorate wild animals. According to her posts, one child had his pant leg bitten by a one of her animals named "Collette" (species unknown) and he was also scratched on the neck by a tegu.

Ms. Limbert recently obtained an Egyptian fruit bat, purchased from an operation called the "Flying Fox Conservation Fund". The bat (a youngster) was removed from her mother and purchased for \$800 plus shipping. Ms. Limbert reportedly attempted to feed this animal fruit flavored tums and yogurt (for calcium) and plans to use the bat in an educational event on Oct. 31, where dozens of children will be present. She is currently housing the bat in a small dog-carrier sized cage, and has allegedly stated that she plans to continue to house the animal this manner because it will make the bat more manageable to use in children's programs. Housing the bat in this small cage is in violation of USDA Subpart F (species that fly). When we approached Ms. Limbert and politely encouraged her to transfer the bat an accredited facility with a flight cage, she stated that she would rather "send the bat to one of her ZAA buddies", which is possibly a worse fate for the animal.

Confining a large fruit bat to a small, inappropriate cage for playing, petting, and photo sessions with the public is a potential health risk as well as a violation of the Animal Welfare Act.

Done responsibly and humanely, education about animals can be of great benefit to children and adults. However, education that allows children to pet and handle exotic baby animals, such as the programs provided by Lisa's Creatures, not only sends the wrong message to children but it can have grave consequences for both the children and the animals involved. Besides the stress caused to the animal, which may provoke biting, there is an increased risk of diseases such as herpes B virus, salmonella, hendra virus, nipah virus, encephalitis, and rabies, all of which are highly infectious and potentially fatal to humans. According to the HSUS, more than 74,000 cases of salmonella poisoning are linked to exotic pets/reptiles each year in the United States alone. They further state that it's not unusual for exotic pets to be malnourished and stressed; they also tend to develop behavioral issues that can lead to bites and attacks, as evidenced by the attached Lisa's Creatures Facebook posts.

I urge you to act quickly for the sake of public safety as well as this bat's behalf. In my 20 years of working with both fruit and insectivorous bats, I can assure you that this bat will become very frightened in a loud/noisy children's program and will bite a child who attempts to pet and or pick it up. Please encourage Ms. Limbert to transfer Echo to a bona fide GFAS or ASA accredited sanctuary so the bat won't endanger the public by biting someone out of fear for her safety, or suffer the fate of falling even further into the exotic pet trade to become breeding stock or used in a roadside zoo. Please also encourage Ms. Limbert to provide programs that do **not** allow the touching of wild animals, and lastly, please limit her exotic collection to animals which won't endanger the public.

Respectfully,

Amanda Lollar

Amanda Lollar

Founder and President

Bat World Sanctuary, Inc.

940-325-3404

www.batworld.org

Global Federation of Animal Sanctuaries Verified

American Sanctuary Association Accredited

Please join us on [Facebook](#) and [Youtube](#)!

PLEASE GO GREEN, print only if necessary



Lisa's Creatures

January 14

Here we are with the new banner at the festival. (b) (6) would like to say "Happy Birthday" and "sorry" to the boy she bit on the pant leg in class today. The poor kid also got a scratch on the neck from the tegu. He was a very good sport and has some "animal skin art" to show his friends. Happy Birthday! The critters and I are hope you are brave enough to return to class. They promise to take it easy on you next time.





Lisa's Creatures

February 7

How much "cute" can one picture hold! This daring little girl has Meriden, the bettong, in a pouch. Both are too sweet for words, so I will just let you look at the photo.

Like · Comment · Share

(b)(6)(b)(7)(c)



Lisa's Creatures

October 14

"Meet Mia" She is a baby Patagonian cavy that we picked up from Roos N More in Nevada. We are raising her to be our second educational out reach cavy, and give Quinn a break. Mia has a very docile temperament. During class she got to wear her first hair bow.



Like · Comment · Share

October 15 at 10:04pm · Like



Lisa's Creatures That is the one I was thinking of. Does the mountain paca eat fallen fruit?

October 15 at 10:19pm · Like



Lisa's Creatures

October 14

Another guinea pig was decorated during class yesterday. He looked beautiful. I'm not sure what the animals think is happening when a beauty session is taking place. They just seem to enjoy the extra attention. Perhaps they recognize the value of grooming.





Lisa's Creatures Timeline ▾ Now ▾

The strangest things turn up at parks and rec sometimes. This little girl is cuddling a baby paca. Although, soon she will be heading for a zoo in Georgia, right now this interesting rodent is delighting my students.



Lisa's Creatures
October 12

Quinn is a pretty good sport during our "Meet the Creature" classes. Here she is getting a good brushing. I feel very fortunate to have such an easy going Patagonian cavy to share with the kids.



Like



Like Comment Share

(b)(6)(b)(7)(c)
(b)(6)(b)(7)(c)

is an interesting color.
ke



Lisa's Creatures Yes, Garret is very light. I have seen them range from a dark rusty color all the way to greenish. They variation is impressive.

21 hours ago · Like



Lisa's Creatures
October 12

One of the nice things about having a class with such a laid back structure is the time it gives the kids to hold and talk animals with each other. After a short introduction, my students are free to choose which animals they would like to handle. I am there to assist and answer questions.





Lisa's Creatures Timeline ▾ September ▾

Class today was fantastic! I have mentioned before that Quinn is a very nosy animal. Today she got a blue tongue up her nose. Oz, the skink, is able to taste the air with her Jacobson's organ.



Like · Comment · Share

👍 17 💬 8



Lisa's Creatures

October 16



Aubrey was treated to a grooming from this nice little boy.



Like · Comment · Share



Lisa's Creatures Timeline ▾ Now ▾



October 18 🌐

After a good brushing, Mia was just about asleep in this little girl's arms. The two were so sweet together.

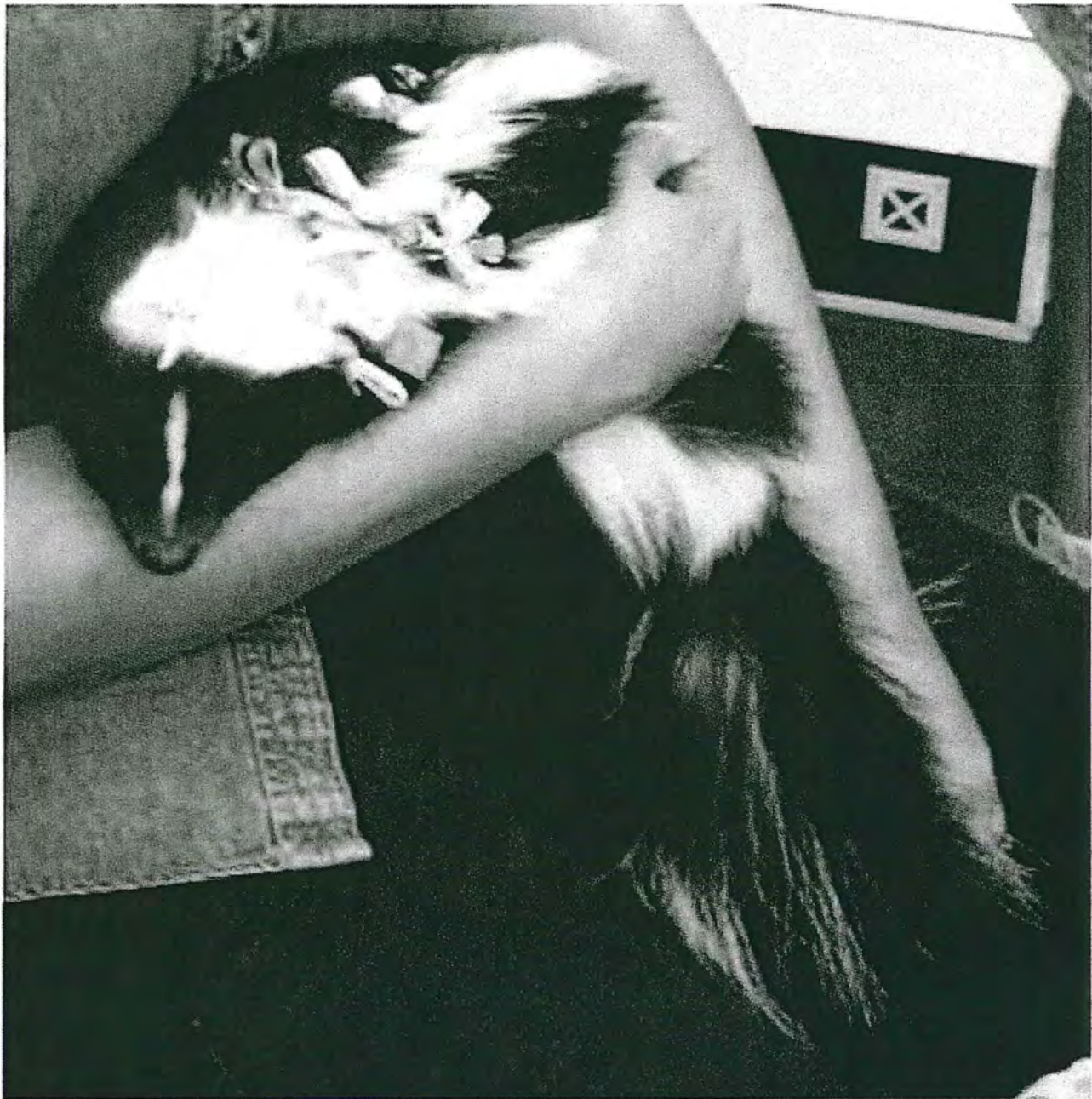


Like · Comment · Share



Lisa's Creatures
September 22

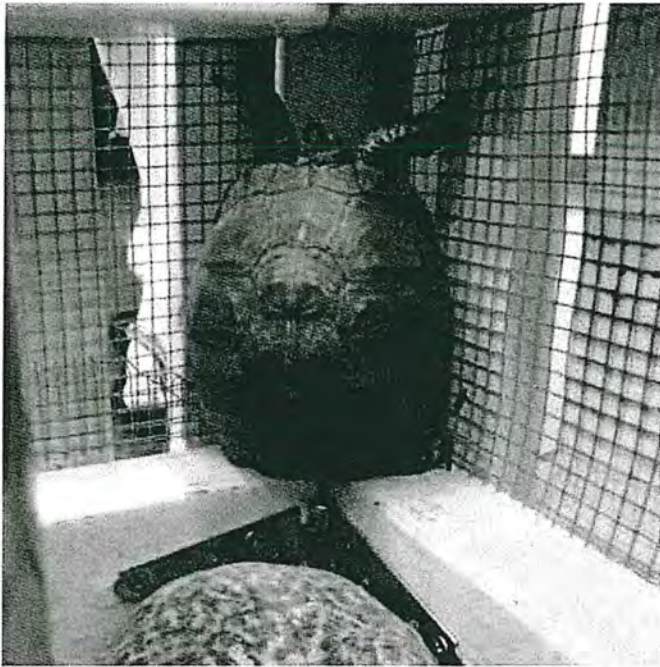
Myka was really styling after one of the dads was done doing her hair. His daughter was having a little trouble working the clips, so he stepped in to help. Now that is a good daddy!





Lisa's Creatures
October 13

Sometimes I think Sheldon, the box turtle, is the smartest animal in the petting pen. He is always testing the structural integrity of the fence. Today he tried to climb over. It was a valiant effort.



Like · Comment · Share

1

Sabrina Hsiang, Theresa Potter, Sara Beth and 14 others like this.

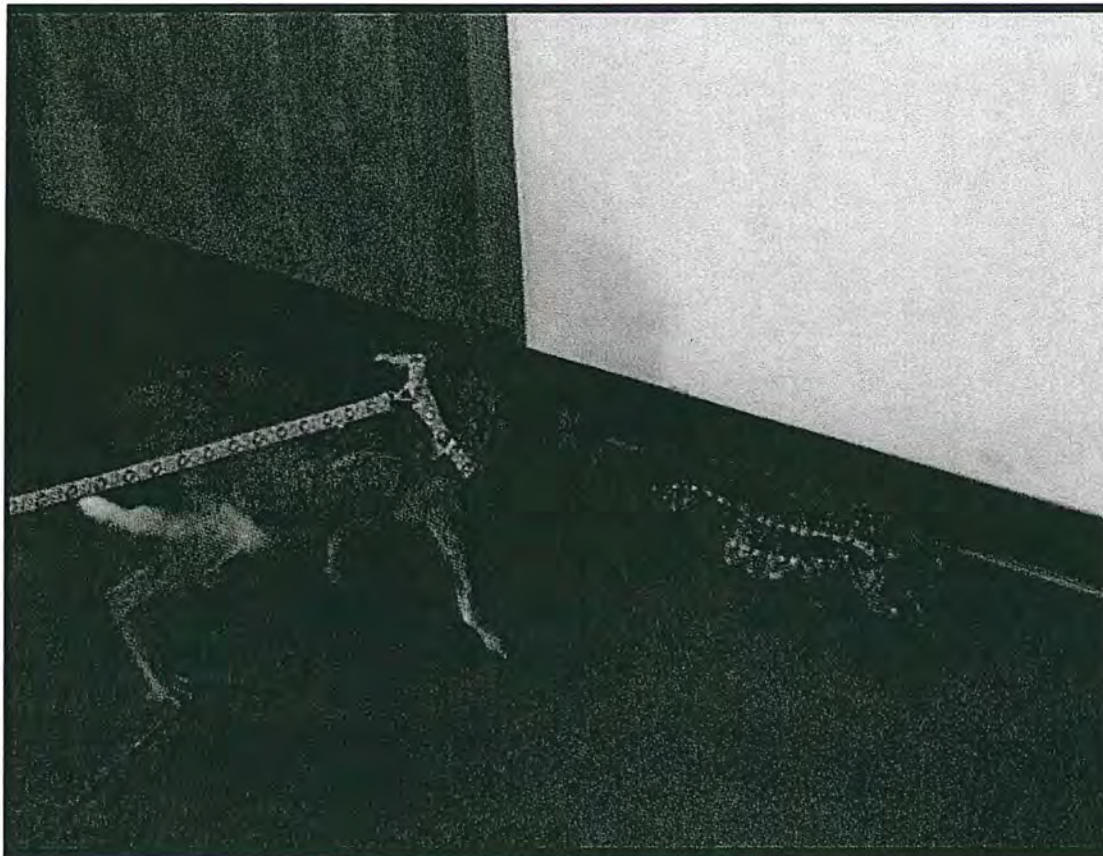


Lisa's Creatures
October 13

Roxanne the flying squirrel woke up long enough to get a little love pat on the head during class today. She is so cute!



Like · Comment · Share



Lisa's Creatures
June 24, 2013

Like · Comment · Share



Lisa's Creatures

February 20

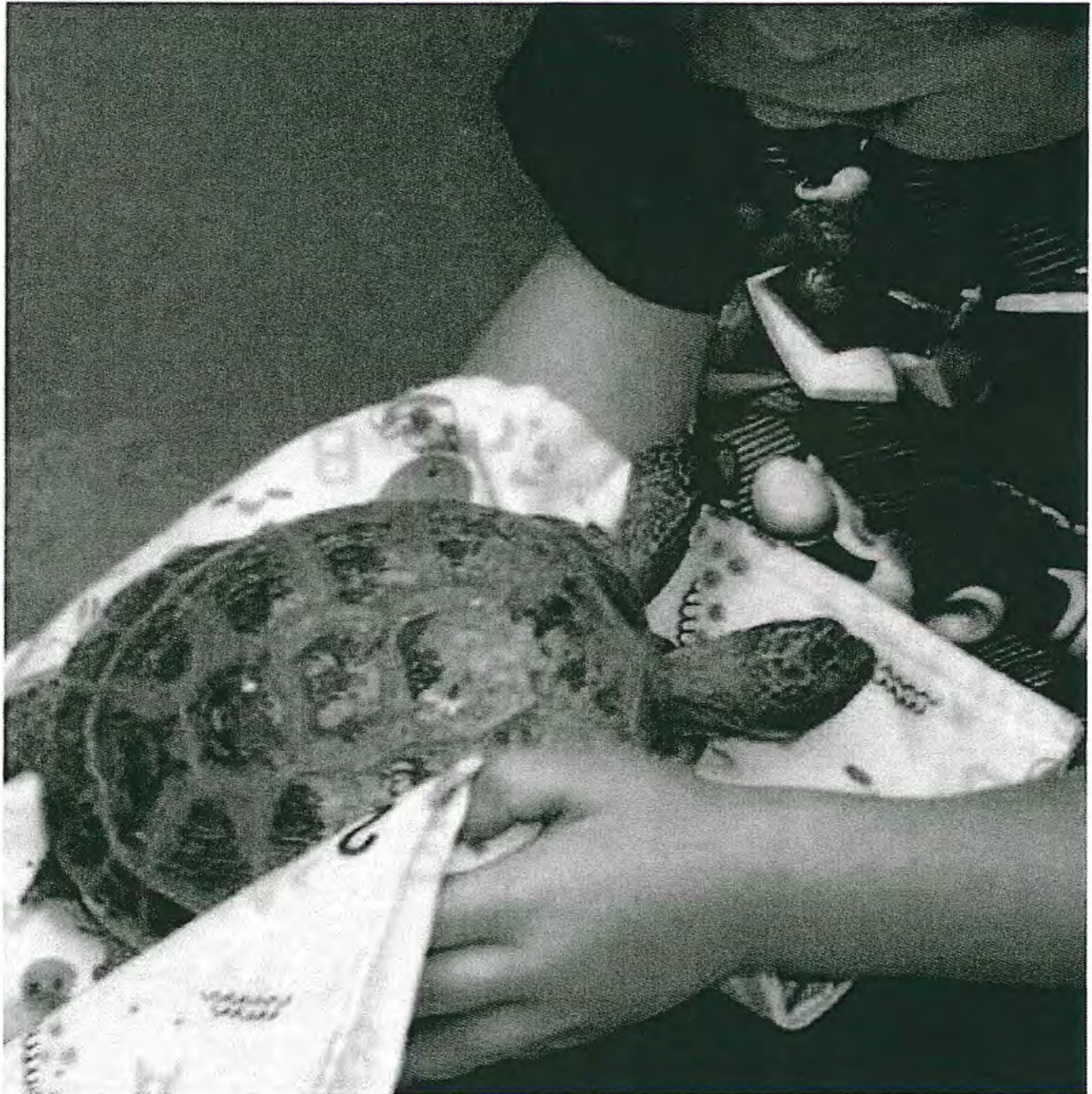
I don't think I've ever posted this picture before. It is from summer 2011 when Timber was a baby, and still liked water. He would swim during "Meet the Creature" classes in this Martha Stewart bathtub. I wonder if Martha would be pleased to see her product being used in such a way? Probably, she is an animal lover. Timber wouldn't fit in this tub anymore.





Lisa's Creatures
Thursday

Here is the picture I meant to post of our Russian tortoise. Her name is Natasha.



Like · Comment · Share



Lisa's Creatures

January 23

Timber is cute in all of his pictures, but this may be his best baby photo. He is such a delight and I feel so lucky to have him. During our last field trip he got to dig a hole. The kids thought it was a hoot. The guest visiting the Riparian Institute Preserve get such a surprises when they see school children walking a beaver on a leash. Timber is bigger now, but he has the same cute face.





Lisa's Creatures

December 25, 2011

Sandy the Fennec fox went to Sunrise along with me and Quinn.
He was a big hit.



Like · Comment · Share

👍 3 💬 2



Lisa's Creatures Timeline ▼ 2012 ▼



Lisa's Creatures

February 4

Cinnabar, the ringtail cat has heard about all the attention that Buttercup received on Groundhog Day. She would like everyone to know that the ringtail cat is the state mammal. February 14th is Arizona's Centennial and we will be having a native animal themed class for ages 2-6 at 10:30am. Please come and meet Cinnabar and many other furry and scaly critters. <http://chandleraz.gov/default.aspx?pageid=299>





Lisa's Creatures

February 11

Jabba hasn't been eating his dubia roaches for the kids in class, these days. Mostly, he just sits like a lump. He is acting kinda "broody" like my hen. With Jabba, I think it is a hibernating frog thing.





Lisa's Creatures

February 26

Miss Puggle Wuggle made a friend during yesterday's "Meet the Creature" class. She is a lovely armadillo. I'm so happy to have her as part of our collection of ambassador animals.



Like · Comment · Share

3



Lisa's Creatures

March 6

I don't know who is happier, Sheldon the turtle or this darling little girl. Sheldon was all the way out of his shell for her. That is a sure sign of a box turtle who has found a friend.



Like · Comment · Share

4 1



Lisa's Creatures Timeline ▾ 2012 ▾



Lisa's Creatures shared North Georgia Zoo (home of Wildlife Wonders and Paradise Valley Farm!)'s photo.

March 16

Hope the paca has a new name. She is now Petunia. I knew a name change would probably be necessary since the owner of the zoo is named Hope.

Paca's and their exceptionally long whiskers can sure be ticklish! Petunia the Paca is loving all the attention of being an animal ambassador with Wildlife Wonders- ZOO TO YOU/ Creation Encounters





Lisa's Creatures

March 31

It was great to have Annabell back at class once again. She is still as lovely and docile as ever. Thanks to Bearizona, she is much easier to hold. I'm happy to report that both skunk girls are sticking to their healthy diet. They will remain skunk bikini ready.





Lisa's Creatures

March 26

During the Feathered Friends Festival we used pens so the animals could get a break and relax. In this picture Colette and Sandy are sharing one. The leashes were to keep them apart. They were civilized in each others' company, but we weren't taking any chances.



Like · Comment · Share





Lisa's Creatures Timeline 2012



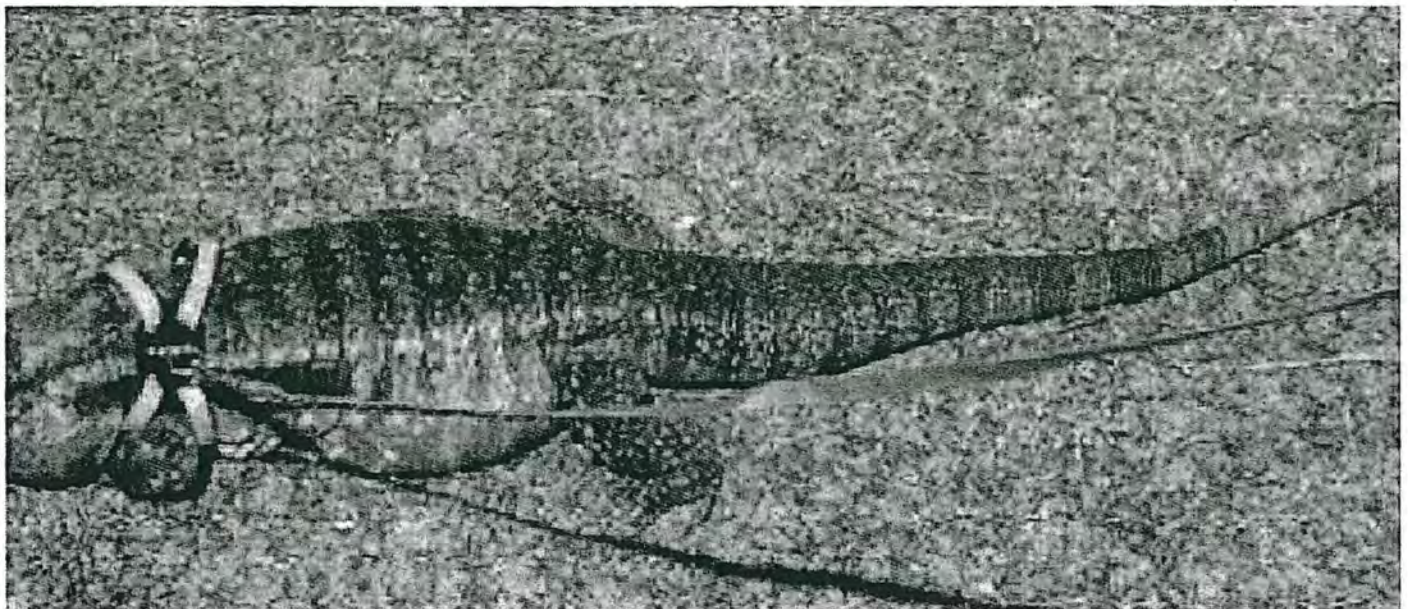
Lisa's Creatures
March 21

Wibur the Patagonian cavy was raised indoors with the cats. He did everything they did. Now he lives outside with his cavy wife. I came across this photo and had to laugh. I don't know why I thought all baby animals needed clothes. Thankfully, Wibur didn't seem to mind too much.



Lisa's Creatures
March 26

Raspberry enjoyed the sun at this weekend's Feathered Friends Festival. She was sporting her sparkly harness. It isn't really necessary. Raspberry is a very slow and easy going reptile.



Like



Lisa's Creatures
March 20

Oh, how cute is this! Here is my little man, Timber, all snuggled into a pouch. The fun thing about a beaver is that they always have a cute baby face. Timber is bigger now, but he still looks just the same. Of course, I don't even think his tail would fit in this pouch anymore.





Lisa's Creatures

September 19

This little one is still hanging out with mom, but soon will be joining Lisa's Creatures. It is an Egyptian fruit bat. Baby bats literally hang on their mothers while growing up. I am so excited to have this amazing creature help me teach kids about bats. I have been a bat rehabber for several years, providing care for injured and orphaned wild bats.



Lisa's Creatures It has been on mine too. For so long! I got the permit a few months ago. I just recently found a captive bred USDA licensed baby. Very important when working with children.

September 19 at 12:13pm · Like · 1

(b)(6)(b)(7)(c)



Lisa's Creatures I am looking forward to getting my hands on the little one, as well. I can't wait to feel the wings. The bats I rehab are Mexican free tails. They are much smaller and eat insects. This little fruit muncher will be quite different.

September 20 at 12:10pm · Like

(b)(6)(b)(7)(c)



Lisa's Creatures Yes, my baby bat is coming from Scott. I'm so excited!

September 22 at 10:55pm · Like



October 24

"Meet Echo" Yes, she is finally here! Our new Egyptian bat arrived Monday. She is settling in nicely. There are many times I feel like the luckiest girl in the world, but having Echo here is so amazing it is hard to put into words just how thankful I am.



(b)(6)(b)(7)(c) She is adorable!



October 24 at 1:54pm · Like



Lisa's Creatures Thank you so much. Eric and I are so proud that you would think we made her ourselves. Credit must go to her bat parents at Flying Fox Conservation Fund.

<http://www.flyingfoxconservationfund.com/home.html>

October 24 at 1:59pm · Like · 1



Lisa's Creatures Her little ears twitch back and forth. Although fruit bats do not use echolocation to find prey they do use it to navigate. I thought the name still fit. Glad you like it too.

October 24 at 2:03pm · Like · 2



Lisa's Creatures

October 24 · 🌐

Echo was happy to let me feed her as soon as she got out of her shipping crate. Her first snack was mixed fruit baby food on a spoon. The thing she is hanging on is her Moolie. It is a soft hanging bed made for cats. She sleeps inside it during the day. She hangs from the center. I can see her little face peeking through the opening. So cute!



👍 20 people like this.



(b)(6)(b)(7)(c) How much bigger will she get? The fruit bats here (at the zoo) are really large at adulthood. The babies are so cute

October 24 at 2:04pm · Like



Lisa's Creatures Well (b)(6)(b)(7)(c) I'm a bit embarrassed to admit that I'm not actually sure how big Echo will get. I would expect her to about double in size. I did as much research as I could and talked to lots of zoo people, but she is quite a bit different than the little insectivore bats I'm used to working with. This is new for me, so we will all be learning together. I will tell you that if she continues to eat as much as she currently is, she could be enormous! I have never seen a critter gobble up as much food as she does.

October 24 at 2:15pm · Like



USDA, APHIS, Animal Care
ANIMAL WELFARE COMPLAINT

Complaint No. FY#W13-019A	Date Entered 13-Nov-12	Received By EMC
------------------------------	---------------------------	--------------------

Referred To Tanya Tims, DVM, SACS & Warren Striplin, ACI	Reply Due
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Facility or Person Complaint Filed Against

Name Lisa Limbert	Customer/License/Registration No. 86-C-0097/#43456
----------------------	---

Address 894 E. Erie Court

City Gilbert	State AZ	Zip 85295	Phone No 480-963-2483
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Complainant

Name (b)(6), (b)(7)(c)	Organization N/A
---------------------------	---------------------

Address

City *?	State *?	Zip *?	Phone No./Email address (b)(6), (b)(7)(c)
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How was complaint received?

email

Details of Complaint: Concern about Echo and others in her care.
Cage the animals in a inappropriate cage.

Results: ****On November 20, 2012 Animal Care VMO Dr. Judy Davis and myself conducted a full inspection at Lisa Limbert's facility on Erie Court in Gilbert, AZ. to follow up on allegations presented in this complaint. An inspection report has also been prepared.

Application packet provided? Yes ☐
No ☒

INSPECTOR
Warren A. Striplin, ACI
REVIEWED BY

DATE
25-Jan-13
DATE

(b)(6)(b)(7)(c)

INSPECTOR

Warren A. Striplin, ACI

REVIEWED BY

DATE

25-Jan-13

DATE

1-25-13

(b)(6)(b)(7)(c)

Celli, Evelyn M - APHIS

To: (b)(6), (b)(7)(c)
Subject: FW: Important, please read
Attachments: Dear USDA.docx

November 14, 2012

(b)(6)(b)(7)(c)

Dear Complainant:

Thank you for your emailed letter dated November 7, 2012 concerning Lisa Limbert. Your concern has been issued number #W13-019A. If you wish to know the results of our findings, you must send a request, in writing, to our Freedom of Information Act office. Depending on the circumstances of the situation, please allow us enough time (30 to 60 days) to thoroughly investigate your concerns.

FOIA requests can be submitted three ways--

1. Email: foia.officer@aphis.usda.gov
2. Fax: 301-734-5941
3. US Mail: USDA, APHIS, FOIA
4700 River Road, Unit 50
Riverdale, MD 20723

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Animal Care inspectors conduct routine unannounced inspections at all USDA licensed and registered facilities to ensure that they are meeting or exceeding these minimum standards. Our inspectors also conduct searches for unlicensed facilities conducting regulated activities. We perform inspections and searches when necessary in response to valid concerns and complaints received from the public to ensure the well-being of the animals and compliance with the law. If violations are found, enforcement action appropriate for the circumstances will be initiated.

Please be assured that we will look into your concerns and take appropriate action if necessary.

Thank you for your interest in the welfare of these animals.

Sincerely,

(b)(6)(b)(7)(c)

Robert Gibbens, DVM
Director, Western Region
USDA, APHIS, Animal Care

Dear USDA,

I am writing out of concern for Echo and the other animals in Lisa Limbert's care. I am appalled at what she is being allowed to do with these animals. Lisa says that these animals have to be kept in small, unnatural settings for them to make good ed animals. That is ridiculous! There are countless education programs that use animals kept in spacious enclosures where they can live as naturally as possible in captivity. The only reason to do what she is doing is because she is spending a lot of money on these animals and doesn't want to take a chance that they won't be happy to do ed programs. Rather than taking that chance she is stripping them of everything natural and breaking their spirits to the point that they don't care whether they are used for programs or not.

Your own regulations say that flighted animals are required to have flight cages and yet Lisa is being allowed to cage this poor bat and many other animals in inappropriate cages. Not only is she being allowed to do this but when confronted she stated that her USDA guy is pissed that anyone would dare to tell him what he can do in his jurisdiction. She said that it was up to her USDA inspector to decide what the best housing is for the animals in her care. Lisa stated that he is so pissed off that if he had his way he would make sure that Echo would never be allowed to fly. I really hope this isn't true and that your officers are not being allowed to break your own guidelines. Best case scenario by continuing to allow her to have a permit shows that USDA approves of how she is housing/caring for her animals.

The animals in her care are not being vaccinated despite being repeatedly exposed to young children. Plus, several years back her veterinarian did group fecal tests on her animals. After that Lisa stated that the USDA didn't want her to do that anymore. She stated that it sets a precedent for the animals to be regularly tested. She said that the USDA wanted people like her to be able to have all these animals and people like her can't afford to do regular testing on the animals. As a result given the high turnover rate of her animals the majority of them have not been tested for parasites or anything else. Once again children are regularly exposed to these animals which poses a high risk. Is this really the types of facilities that USDA supports/approves of? Lisa makes it sound to me that the USDA is discouraging people from ensuring the animals that are being exposed to the public are healthy. It doesn't appear to me that anything is being done to ensure the safety of these animals, or the public.

I was appalled to see her Facebook page and see that she is educating future generations! What exactly is she teaching these kids? I want my child to learn how incredible it is that bats are the only flying mammal. I want him to know how social they are and that Egyptian Fruit Bats in particular are one of the largest colony fruit bats, roosting in colonies up to 50,000 in numbers. I don't want him to learn this from someone keeping one in isolation in a cage where she can't fly. I don't want him educated by someone who spent almost a thousand dollars to have a baby pulled off of her mother and shipped out to the highest bidder.



These kids are learning how fun it is to have and play with/dress up our wildlife. Our nations wildlife are being used in a petting zoo under the guise of education. Does anyone really believe that these children are learning to respect and advocate for wildlife!?



They are learning that you can put a reptile in the same enclosure as a rabbit and an Armadillo instead of learning about the risks of exposing mammals to Salmonella. They are also not learning that Herbivores commonly carry Flagellates which can be fatal to carnivores.



I want my child to learn about nature. How is an Armadillo, Groundhogs, and Gophers that can't burrow teaching them that? How is a highly social, flighted bat that is kept isolated and not allowed to fly teaching that? How is a Beaver that can't swim, a flying squirrel that can't glide, and Skunks with hair clips in their hair teaching that!? Lisa is not doing service to those animals or those kids. The kids she teaches are not learning to respect these animals. They are learning how fun it is to play with them. What happens when they come across a bat, skunk, possum, fox or other wild animal. If she tells them not to touch wild animals it will make no difference because children learn by doing. Most won't remember what they were told, they will remember what they experienced .

How is Lisa education children when she can't even be bothered to educate herself?



lisa's Creatures Weft Pamela,I'm a bit embarrassed to admit that I'm not actually sure how big Echo will get. I would expect _____ her to about double in size. I did as much research as I could and talked to lots of zoo people, but she is quite a bit different than the little insectivore bats I'm used to working with. This is new for me, so we will all be learning together. I will tell you that if she continues to eat as much as she currently *is*, she could be enormous! I have never seen a critter gobble up as much food as she does.

October 24 at 2:15pm • Like

It took me less than 2 minutes to learn that Egyptian Fruit Bats as adults have a 2 foot wing span, weigh an average of 160 grams and a body length of 6 inches.

In addition to the housing issues with the animals in her care she regularly post pictures of unhealthy(skinny or obese) animals on her page.





I have seen many stories in papers/magazines and on TV about how cool what Lisa does is. I wonder how many know what she is doing to those animals behind closed doors. I wonder if they know how she is housing them and the damage that it causes these animals. I wonder if they know she is taking newborn animals, such as the Armadillos, Pacas, Patagonian Cavys, and others, out in public for kids to hold and play with. I wonder if they know the health risk she is exposing these babies to by taking them out in public. Newborns have very limited immune systems and are highly prone to stress related issues.



(b) (6)



My cousin and her kids went to a program where Lisa had a newborn Armadillo. My cousin doesn't know much about animals but she felt that that was very risky to the baby. Lisa announced that the baby Armadillo died less than a week later. If something isn't done to put a stop to this I will make sure every news station knows what is going on at Lisa's Creatures and that she is doing all of this with the approval of the USDA. I don't want to cause problems for you, but I will do whatever I can to help these animals, protect these kids, and to stop Lisa's poor education practices. I strongly feel that our future generation need to be taught to respect and care about animals, not cage them for our own entertainment.

Regina Walker

11/6/12

Celli, Evelyn M - APHIS

4345 b
86-C-0097

From: AC West
Sent: Tuesday, January 22, 2013 11:36 AM
To: Celli, Evelyn M - APHIS
Subject: FW: 86-C-0097 itinerary (nine-banded Armadillo)

-----Original Message-----

From: (b)(6) & Lisa Limbert [mailto:limber(b)(6)]
Sent: Sunday, January 20, 2013 10:55 AM
To: AC West
Subject: 86-C-0097 itinerary (nine-banded Armadillo)

Animal involved: Miss Puggle Wuggle, nine-banded armadillo (*Dasypus novemcinctus*), female, three years old.

Tuesday, 22 January 2013: Travel day from home location (894 E Erie Court, Gilbert, AZ 85295). Will be housed overnight at Best Western Valencia Inn, 27413 Wayne Mills Place, Valencia, California, 91355-1809.

Wednesday, 23 January 2013: Exhibited at Piru Central Park, Center Street & Piru Square, Piru, CA 93040 by Jackie Navarro (USDA certificate 93-C-0440) and Lisa Limbert (USDA certificate 86-C-0097). Returning to Best Western Valencia Inn after exhibition.

Thursday, 24 January 2013: Exhibited at Superfine Gas Station, 8730 Lankershim Boulevard, Sun Valley, CA 91352 by Jackie Navarro (USDA certificate 93-C-0440) and Lisa Limbert (USDA certificate 86-C-0097).
Returning to Best Western Valencia Inn after exhibition.

Friday, 25 January 2013: Travel day from Best Western Valencia Inn, 27413 Wayne Mills Place, Valencia, California, 91355-1809 to home location (894 E Erie Court, Gilbert, AZ 85295).

DATE	NO. OF	DESCRIPTION	REMARKS	DATE	NO. OF	DESCRIPTION	REMARKS
10/1	9	Rabbits	10/1	10/1	10/1	10/1	10/1
10/1	10		10/1	10/1	10/1	10/1	10/1
10/1	11		10/1	10/1	10/1	10/1	10/1
10/1	12	Tucker Jewish Grant	10/1	10/1	10/1	10/1	10/1
10/1	13	Harvey Jewish Grant	10/1	10/1	10/1	10/1	10/1
10/1	14	Drew Jewish Grant	10/1	10/1	10/1	10/1	10/1
10/1	15	Black & white bunny	10/1	10/1	10/1	10/1	10/1
10/1	16	White spotted rabbit	10/1	10/1	10/1	10/1	10/1
10/1	17	White spotted rabbit	10/1	10/1	10/1	10/1	10/1
10/1	18	Current 2012 All Male	10/1	10/1	10/1	10/1	10/1
10/1	19	Female Honeybun	10/1	10/1	10/1	10/1	10/1

Photographer: Tracy Thompson

Legal Name:

86-C-0097

Photo Taken: Thu, Jun 13, '13

LISA LIMBERT

Inspection: 164131206518005

Description: Record of animals on hand for rabbits; incomplete information for acquisition of 1 female named "Honeybun"

RECORD OF ANIMALS ON HAND
(Other than Dogs or Cats)

U.S. DEPARTMENT OF AGRICULTURE
NATIONAL ANIMAL HEALTH INSPECTION SERVICE

Form No. 1 (Rev. 11-1-60)

1. NAME AND ADDRESS OF OWNER
Lisa Limbert 894 E Elm St Gilbert, Ar 85295

2. DATE OF ENTRY
2/27/2011

3. NUMBER OF ANIMALS
3

SPECIES	SEX	AGE	DATE OF ENTRY	DISPOSITION		REMARKS
				ADDED	REMOVED	
Fennec Fox	♂	1	2/27/11			(b)(6)
Current 2011	♂	1				
Male 1 Female	♀	1				

4. TOTAL NUMBER OF ANIMALS ON HAND
3

5. TOTAL NUMBER OF ANIMALS REMOVED
0

6. TOTAL NUMBER OF ANIMALS ON HAND
3

Photographer: Tracy Thompson Legal Name: 86-C-0097
 Photo Taken: Thu, Jun 13, '13 LISA LIMBERT
 Inspection: 164131206518005
 Description: Record of animals on hand for fennec foxes shows 3 animals(2 males, 1 female) but 1 male + 1 female on site; no disposition record for 1 male had been made



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Shelter structure in outdoor enclosure for 4 pacas that is in disrepair and has numerous sharp nails/staples protruding		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Indoor enclosure for 1 groundhog with accumulation of cobwebs at the top of the enclosure		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Bent and unsecured wire mesh with sharp points protruding & accumulation of cobwebs in enclosure housing 4 Patagonian caviars		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Bent and unsecured wire mesh with sharp points protruding in outdoor enclosure for 4 Patagonian cavies		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Accumulation of cobwebs in outdoor enclosure housing 4 Patagonian cavies		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Bent and unsecured wire mesh with sharp points protruding in outdoor enclosure for 4 Patagonian caviars		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Bent and unsecured wire mesh with sharp points protruding in outdoor enclosure for 4 Patagonian caviars		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Bent and unsecured wire mesh with sharp points protruding in outdoor enclosure for 4 Patagonian caviess		



Photographer: Tracy Thompson

Legal Name:
LISA LIMBERT

86-C-0097

Photo Taken: Thu, Jun 13, '13

Inspection: 164131206518005

Description: Bent and unsecured wire mesh with sharp points protruding in outdoor enclosure for 4 Patagonian caviars



Photographer: Tracy Thompson

Legal Name:

86-C-0097

Photo Taken: Thu, Jun 13, '13

LISA LIMBERT

Inspection: 164131206518005

Description: Overview photos of outdoor enclosure for 4 Patagonian cavies



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Overview photos of outdoor enclosure for 4 Patagonian cavies		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Overview of outdoor enclosure for 4 pacas that with 2 wooden shelter structures in disrepair and has numerous sharp nails/staples protruding		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Shelter structure in outdoor enclosure for 4 pacas that is in disrepair and has numerous sharp nails/staples protruding		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Shelter structure in outdoor enclosure for 4 pacas that is in disrepair and has numerous sharp nails/staples protruding		



Photographer:	Tracy Thompson	Legal Name:	86-C-0097
Photo Taken:	Thu, Jun 13, '13	LISA LIMBERT	
Inspection:	164131206518005		
Description:	Picture of female rabbit, "Honeybun"; incomplete record of acquisition made (no date, name/address, VL#/State, DL#/State)		



Photographer:	W. Stripln	Legal Name:	86-C-0097
Photo Taken:	Tue, Nov 20, '12 mid morning	LISA LIMBERT	
Inspection:	115131225080282		
Description:	Hair and scattered bedding caught in the enclosure wire.		



Photographer:	W. Stripln	Legal Name:	86-C-0097
Photo Taken:	Tue, Nov 20, '12 mid morning	LISA LIMBERT	
Inspection:	115131225080282		
Description:	Hair and scattered bedding caught in the enclosure wire.		



Inspection Report

LISA LIMBERT

Customer ID: 43456

Certificate: 86-C-0097

Site: 001

LISA R. LIMBERT

894 E. ERIE COURT

Type: ROUTINE INSPECTION

GILBERT, AZ 85295

Date: 13 June 2013

2.75 (b)(1)

RECORDS: DEALERS AND EXHIBITORS.

<< (b)(1) Every dealer other than operators of auction sales and brokers to whom animals are consigned, and exhibitor shall make, keep, and maintain records or forms which fully and correctly disclose the following information concerning animals other than dogs and cats, purchased or otherwise acquired, owned, held, leased, or otherwise in his or her possession or under his or her control, or which is transported, sold, euthanized, or otherwise disposed of by that dealer or exhibitor. The records shall include any offspring born of any animal while in his or her possession or under his or her control.

- (i) The name and address of the person from whom the animals were purchased or otherwise acquired
- (ii) The USDA license or registration number of the person if he or she is licensed or registered under the Act;
- (iii) The vehicle license number and State, and the driver's license number (or photographic identification card for nondrivers issued by a State) and State of the person, if he or she is not licensed or registered under the Act;
- (iv) The name and address of the person to whom an animal was sold or given;
- (v) The date of purchase, acquisition, sale, or disposal of the animal(s);
- (vi) The species of the animal(s); and
- (vii) The number of animals in the shipment.>>

The licensee did not make records of acquisition for at least seven animals which contain the information required under the Act.

--One female rabbit named "Honeybun" was listed on the record of animals on hand and was present during the inspection but the record did not contain the date of acquisition, the name and address of the person from whom the animal was acquired, or the vehicle license number and State and the driver's license number and State for this unlicensed person.

--A record of acquisition for three male guinea pigs was made on 7/31/10 but these animals were not included in the licensee's total number of guinea pigs on the record of animals on hand nor was there a corresponding disposition record to account for these animals. The record does list two male guinea pigs acquired from a different person sometime in 2010 (no date or description of the animals recorded) and has two male guinea pigs acquired in November 2010 (no date or description of the animals recorded) from yet another facility. There is no way to accurately account for what happened to these three male guinea pigs after they were

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TRACY A THOMPSON, D.V.M. USDA, APHIS, Animal Care

Title:

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Date:

14 June 2013

Received By:

(b)(6),(b)(7)(c)

Date:

14 June 2013

Title:



Inspection Report

acquired by the licensee.

--There was a female hairless guinea pig present during the inspection and listed on the record of animals on hand on the line describing "2012 Current" but there is no corresponding acquisition record with the date of acquisition, the name and address from whom the animal was acquired, whether this person was licensed/registered with the USDA, or the vehicle license number and State or driver's license number and State for the person if unlicensed.

--The record of animals on hand listed three fennec foxes (2 males, 1 female) but only two (1 male, 1 female) were present during the inspection. Two of the animals added to the record on the line "Current 2012" lists "2 males, 1 female" but there is no date, the name and address of the person from whom the one male and one female were acquired, whether this person was licensed/registered with the USDA, or the vehicle license number and State or driver's license number and State for the person if unlicensed.

The licensee did not make records which contain all of the required information under the Act for the disposition of at least five animals.

--The record of animals on hand listed four sugar gliders but only one female sugar glider was present during the inspection. The licensee stated that one had died but no date of death or other record of disposition had been made. The licensee stated that two other sugar gliders were given to an unlicensed person but no record containing the date of disposition or the name and address of the person was made.

--The record of animals on hand listed eight guinea pigs but only seven guinea pigs (5 males, 2 females) were present during the inspection. The licensee did have email records between the attending veterinarian and herself regarding a recent death of one male guinea pig but the licensee stated that one guinea pig had been recently given to another licensee but no record of the date or the name and address of the licensee had been made. The death of one animal and disposition of another from the current record of animals on hand should reflect six guinea pigs but there were seven on hand.

--The record of animals on hand listed three fennec foxes (2 males, 1 female) but only two (1 male, 1 female) were present during the inspection. The licensee stated that an animal was recently sent to a facility in Oregon but no record of disposition was made with the date or the name and address of the person who received the animal.

Records of acquisition and disposition which correctly and fully disclose all of the required information are necessary to ensure that animals are acquired legally and disposed of appropriately as well as transported and handled humanely.

Records of acquisition and disposition shall contain the name and address of the person from whom the animals were acquired or were sold/otherwise disposed to, the USDA license/registration number of the person from whom the animals were acquired if licensed or registered under the Act, the vehicle license number and State and driver's license number and State of the person if unlicensed/unregistered, the species and number of animals in the shipment, and the date of acquisition or disposition.

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(b)(6), (b)(7)(c)

Date:

14 June 2013

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Inspection Report

To be corrected by 6/20/2013

3.125 (a)

FACILITIES, GENERAL.

<< (a) 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.>>

--The outdoor housing for four Patagonian caviars had several areas where wire mesh screening was bent or unsecured exposing sharp points and edges which pose a risk of injury to the animals.

--The outdoor housing for four pacas had two wooden shelter structures that were worn and chewed so that nails and staples with sharp points were exposed which pose a risk of injury to the animals. One of these structures was also chewed such that approximately 40 % of the structure was damaged or missing and is no longer structurally sound or in good repair.

Facilities and materials provided for animals in their enclosure shall be structurally sound and maintained in good repair to protect the animals from injury.

To be corrected by 6/16/2013.

3.131 (c)

SANITATION.

<< (c) Housekeeping. Premises (buildings and grounds) shall be kept clean and in good repair in order to protect the animals from injury and to facilitate the prescribed husbandry practices set forth in this subpart>>

--The indoor enclosure for one groundhog had an accumulation of cobwebs in and around the top of the enclosure.

--The outdoor enclosure for four Patagonian caviars had an accumulation of cobwebs along the wire mesh screening in the north corner.

Accumulation of cobwebs and debris indicate that the facilities are not being kept clean and pose a risk to the health of the animals since they harbor pests and may contaminate food and water.

Premises shall be kept clean and in good repair to protect the animals and facilitate husbandry practices.

To be corrected by 6/16/2013.

Accompanied on the inspection by the owners. Exit interview conducted on site on 6/14/2013 with the owners.

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Title:

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Date:

14 June 2013

Received By:

(b)(6),(b)(7)(c)

Date:

14 June 2013

Title: