

December 5, 2018

Gopaul Noojibail
Grand Teton National Park Deputy Superintendent

Dan Smith
Deputy Director
National Park Service, U.S. Department of the Interior

Via email: [REDACTED]

Dear Deputy Superintendent Noojibail and Deputy Director Smith,

I'm writing on behalf of PETA to provide information about Oswald's Bear Ranch (OBR), after reports that the Zoological Association of America (ZAA)—a pseudo "accreditation" organization—recently recommended to Grand Teton National Park that it place two wild bear cubs at OBR. OBR is a roadside zoo with a sordid history of skirting the law and forcing vulnerable cubs to be used for stressful photo-op encounters to turn a profit. PETA is hopeful that Grand Teton and the National Park Service will refrain from ever placing wild bears there again, due to the following concerns (detailed in the attached appendix):

- Bear cubs at OBR are forced to participate in public encounters and photo-ops for months, an inherently stressful experience for these animals whose instinct is to avoid human contact. Cubs at the roadside zoo have been repeatedly documented exhibiting signs of severe psychological distress.
- Records show OBR shipped three government-placed bears to a captive-breeding facility in Arizona.
- Several bears have died prematurely at OBR, including many government-placed bears.
- OBR has been cited by the U.S. Department of Agriculture (USDA) for putting the public at risk of injury during public encounters, and Michigan Occupational Health and Safety Administration (MI OSHA) concluded that employees are placed at risk of death or serious injury because of the roadside zoo's dangerous bear-management protocols.
- OBR has slaughtered at least six bears, euthanized at least one bear for being "mean" (a result completely unwarranted if Oswald's did not insist on dangerous, professionally disfavored, and unnecessary direct contact management), and told MI OSHA as recently as last year that they believe a "mean" bear should be "made into jerky."
- The U.S. Fish and Wildlife Service (USFWS) investigated OBR for facilitating illegal bear transfers. The USFWS investigator also believed OBR committed a federal offense by falsifying interstate transfer documents.
- In 2013, OBR misled lawmakers to believe it regularly received cubs from the Michigan Department of Natural Resources (MDNR), though the agency had not placed cubs there since 2005 as a matter of policy.

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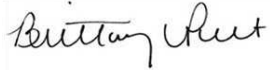
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We hope that after considering the information in the attached appendix, Grand Teton and all of the National Park Service will work only with sanctuaries accredited by the Global Federation of Animal Sanctuaries (GFAS), or zoological facilities accredited by the Association of Zoos and Aquariums (AZA) when it is faced with the unfortunate situation of placing wild bears.

PETA has strong relationships with the accredited sanctuary community and AZA-affiliated bear welfare experts, and in the last five years we have facilitated the placement of 72 rescued bears. We would be more than happy to connect you with these facilities in the future. I welcome the opportunity to discuss this matter in more detail at your convenience.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Brittany Peet".

Brittany Peet, Esq.
Director, Captive Animal Law Enforcement

A solid black rectangular redaction box covering contact information.

Enclosures

Appendix

a. Bear cub health and welfare are put at risk during public photo-ops

As you are no doubt aware, bears in nature avoid contact with humans, and being forced into close proximity with people causes them to feel trapped and vulnerable to those they perceive as predators. Such exposure is a constant, never-ending stressor. Indeed, the cubs at OBR—who were bred and purposefully removed from their mothers to be used for photo-ops—have shown signs of severe psychological distress, including pacing, crying out, biting their wire caging, and incessantly suckling on each other's ears, which resulted in abnormal hair loss. Human contact is not only stressful but also unsafe, and OBR's practice of hand-feeding cubs to apparently attempt to habituate the animals to constant public handling doesn't remove the instincts of these wild animals. As detailed below, OBR insists on using the dangerous direct contact method of bear husbandry, in which adult bears and workers occupy the same space. Direct contact bear husbandry is condemned by reputable accrediting organizations such as the AZA and GFAS.

b. Transfers to breeders and suspicious deaths of government-placed bears at Oswald's

In the 1990s and early 2000s, Michigan DNR and Minnesota DNR placed orphaned cubs or "nuisance" bears at OBR. In 2010, OBR shipped three of the bears it received from these government agencies to a breeding facility in Arizona. (*See Exhibit 1.*) It was surely not the government's intention that orphaned cubs rescued from Michigan or Minnesota lands be shipped across the country to a bear-breeding facility that supplies the entertainment industry with bear cubs for public encounters.

Many bears have died prematurely at OBR—including several "winter fatalities," such as a group of five young bears (two were government-placed) OBR assumed didn't survive because they "lost oxygen," and others (including one government-placed bear) who became trapped in a collapsed den. A sow placed with her two cubs at OBR by the Minnesota DNR died three months after arriving, reportedly from a "drug overdose." (*See Exhibit 2.*) One cub died after hitting his head on a cage, and yearling and juvenile bears have died suddenly from unknown or undisclosed causes. This includes the last wild cub to be placed at OBR prior to the Grand Teton cubs, who died when she was merely two years old. (*See Exhibit 3.*)

c. Oswald's history of endangering the public and its workers

In 2013, the USDA cited OBR for allowing young children to hand feed bear cubs, posing a danger because "bear cubs are often unpredictable and temperamental" and could injure the children. (*See Exhibit 4.*) The USDA again cited OBR in June 2016 after a house guest was scratched by a bear cub. The wound was treated after it became infected two days later. (*See Exhibit 5.*) And, last year, a MI OSHA inspector concluded that OBR "employees were exposed to the hazard of death or serious physical harm through direct unprotected contact with adult black bears during feeding activities." (*See Exhibit 6.*)

d. Oswald's stance on less habituated or "mean" bears

OBR has also slaughtered at least a half dozen bears, and has euthanized at least one bear for being "mean." (*See Exhibit 7.*) During a MI OSHA inspection last year, an OBR representative told the inspector that "a mean bear" should be "harvested, and made into jerky." (*See Exhibit 6.*)

e. USFWS investigation of Oswald's illegal bear cub transfers

Public records show that OBR has purchased or received cubs from breeders and used them in photo-op interactions with paying visitors nearly every year for the last 20 years. Many of these acquisitions and likely all the encounters were in violation of Michigan's Large Carnivore Act (LCA) at the time.

OBR was also under investigation by the USFWS for potential Lacey Act violations relating to these illegal transfers—which supplied their lucrative bear cub photo-op business. The LCA prohibited OBR from acquiring new cubs, and at the time strictly prohibited contact with large carnivores older than 20 weeks old, which OBR had been in violation of for *years*, since the cubs it obtains from breeders and uses for public photo-ops are already at least four months old by the time OBR opens to the public, and the photo-ops typically occur all summer long. The USFWS agent stated in an email to MDNR staff that the Oswalds "have been buying most of their cubs each year, not rescuing them. They have falsified documents related to many of the bears they have which is a federal offense." (*See Exhibit 8.*) MDNR officials have speculated that OBR's financial contributions to well-connected politicians is the reason that OBR owner Dean Oswald was not prosecuted for the illegal transfers. (*See Exhibit 9.*)

f. MDNR's policy against placing orphaned wild cubs at Oswald's Bear Ranch

Despite the USFWS' conclusion that OBR was facilitating illegal transfers and falsifying records, and despite OBR's years-long violations of state law, OBR successfully pressured politicians to amend the LCA in 2013. The law was changed specifically to allow OBR to continue bear cub photo-ops. The amended law now permits public contact with bear cubs until they are 36 weeks old—the cubs' age at the end of OBR's operating season. Prior to the amendment, Dean Oswald misled authorities to believe OBR regularly received orphaned wild cubs, stating in a 2013 letter—copied to lawmakers—that the ranch was expecting to get cubs from "Michigan DNR or DNR in another state." (*See Exhibit 10.*) This was blatantly deceptive, since MDNR had not placed orphaned cubs with OBR *as a matter of policy* since 2005, after it developed an orphaned bear program to place cubs with surrogate sows in the wild. (*See Exhibit 11.*) Prior to the Grand Teton cubs, the last wild cub OBR received was in 2011—the only wild cub placed there by a government agency in the last ten years. (*See list of acquisitions from government agencies in Exhibit 1. Public records through 2018 show that since this list was compiled, OBR received bears from the Ohio Department of Agriculture in 2013 and 2015, however these were captive-born, adult animals and were not orphaned wild cubs.*)

g. Distinctions between the ZAA and legitimate accrediting organizations

It is very important to make a clear distinction between the ZAA and the AZA or GFAS. Facilities that legitimately rescue captive wild or exotic animals in need would never allow any kind of "hands-on" public interaction, as the ZAA does. The ZAA is *not* a trustworthy or reputable accrediting organization—it not only accredits businesses that allow encounters with baby animals (encounters condemned by all legitimate wildlife experts), but it also promotes breeding of wild and exotic animals by private owners and endorses poorly-run roadside zoos and traveling acts with wild animals. Sanctuaries accredited and verified by GFAS are required to comply with rigorous husbandry standards—such as those outlined in [its 62-page Standards of Excellence regarding bear care](#)—and submit to a painstaking evaluation process to ensure that animals at these true sanctuaries are provided with the highest-quality care.

Zoological institutions accredited by the AZA and GFAS-accredited sanctuaries are also required to comply with higher public safety standards than those of ZAA facilities. OBR has [reportedly been hand-feeding](#) the Grand Teton cubs—likely in order to habituate them to dangerous direct human contact, which is the norm at OBR and has led to incidents cited by USDA, as described above.

We hope that after considering all of this information, Grand Teton and all of the National Park Service will never work with OBR again. PETA is willing to connect the Service with the legitimately accredited sanctuary and zoo community, should a similar situation ever arise.