

UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE

In re:	)	
	)	
Jeffrey Lee Lowe, an individual;	)	AWA Docket No. 20-J-0152
Lauren Lowe, an individual; and	)	AWA Docket No. 20-J-0153
Greater Wynnewood Exotic Animal	)	AWA Docket No. 21-J-0003
Park, LLC, an Oklahoma limited	)	
liability company,	)	
	)	
Respondents.	)	

**DECISION AND ORDER WITHOUT HEARING BY REASON OF DEFAULT AS TO  
GREATER WYNNEWOOD EXOTIC ANIMAL PARK, LLC**

Appearances:

*Ciarra A. Toomey, Esq., with the Office of the General Counsel, United States Department of Agriculture, Washington, DC, for the Complainant, the Administrator for the Animal and Plant Health Inspection Service (“APHIS”); and*

*Daniel J. Card, Esq., Oklahoma City, OK, counsel for Respondent Greater Wynnewood Exotic Animal Park, LLC.*

**PRELIMINARY STATEMENT**

This is a disciplinary proceeding under the Animal Welfare Act, as amended (7 U.S.C. § 2131 *et seq.*)(“AWA”); the regulations issued thereunder (9 C.F.R. Part 2) (“Regulations”); and the Rules of Practice Governing Formal Adjudicatory Proceedings Instituted by the Secretary Under Various Statutes (7 C.F.R. §§ 1.130 through 1.151) (“Rules of Practice”).

**PROCEDURAL HISTORY**

The Complainant, the Administrator of the Animal and Plant Health Inspection Service (“APHIS”), United States Department of Agriculture, initiated the initial proceeding against Respondents Jeffrey Lee Lowe and Lauren Lowe by filing a complaint on August 17, 2020. Respondent Jeffrey Lowe timely filed an Answer on September 8, 2020. Respondent Lauren

Lowe timely filed an Answer to the Complaint on October 6, 2020.

The instant proceeding was initiated by an Amended Complaint filed by Complainant on October 26, 2020 to which Respondent Greater Wynnewood Exotic Animal Park, LLC (“Wynnewood”) was added as AWA Docket No. 21-J-0003. All three Respondents were duly served with the Amended Complaint.<sup>1</sup> A Sua Sponte Order Suspending Order Setting Deadlines for Submissions and Amending Case Caption was issued on October 27, 2021. All three Respondents filed an Answer to the Amended Complaint (“Amended Answer”) on January 6, 2021, which was not within the twenty-day period prescribed by section 1.136 of the Rules of Practice (7 C.F.R. § 1.136).<sup>2</sup>

All three Respondents filed Respondents’ Motion to Amend Answer to Amended Complaint (“Respondents’ Motion to Amend Answer”) on February 24, 2021.<sup>3</sup> On March 1,

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<sup>1</sup> United States Postal Service records reflect that the Amended Complaint was sent to Respondents’ counsel via certified mail and delivered on November 16, 2020. Respondent had twenty (20) days from the date of service to file a response. 7 C.F.R. § 1.136(a). Weekends and federal holidays shall be included in the count; however, if the due date falls on a Saturday, Sunday, or federal holiday, the last day for timely filing shall be the following workday. 7 C.F.R. § 1.147(h). Here, Respondent’s answer was due on or before December 7, 2021.

<sup>2</sup> See Summary of February 25, 2021 Telephone Conference and Orders Granting Complainant’s Motion for Leave and Granting Respondents’ Leave to File a Surreply (“February 25, 2021 Telephone Conference Summary”), filed March 2, 2021, explaining, at 2-3, fns. 2-3, that Respondents’ Answer to the Amended Complaint “states, at 1, ‘The Respondents Answer Petitioner’s Amended Complaint as follows. . .’ but does not specify which ‘Respondents’ are answering” but that “until demonstrated to be incorrect, I [the undersigned] will consider Mr. Card as representing Respondent Wynnewood along with the other two Respondents in filing the January 6, 2021 late Answer.”

<sup>3</sup> Complainant filed a Motion for Adoption of Decision and Order by Reason of Default As To Respondents Jeffrey Lee Lowe and Lauren Lowe (“Motion for Default as to Respondents Jeffrey and Lauren Lowe”) and proposed Decision and Order by Reason of Default As To Respondents Jeffrey Lee Lowe and Lauren Lowe (“Proposed Decision as to Respondents Jeffrey and Lauren Lowe”) on January 26, 2021. As noted in the February 25, 2021 Telephone Conference Summary, at 2, “Counsel for Complainant explained that Complainant intended to file a separate Motion for Default as to Respondent Wynnewood” because “Ms. Toomey . . . understood that Mr. Card represents only Respondents Jeffrey Lowe and Lauren Lowe because Mr. Card had not entered an appearance on Respondent Wynnewood’s behalf and because it was not stated that

2021, Complainant filed a Motion for Adoption of Decision and Order by Reason of Default As To Respondent Greater Wynnewood Exotic Animal Park, LLC (“Complainant’s Motion for Default as to Wynnewood”) and proposed Decision and Order by Reason of Default As To Respondent Greater Wynnewood Exotic Animal Park, LLC (“Proposed Decision as to Respondent Wynnewood”), which was duly served on Respondent Wynnewood.<sup>4</sup> On February 25, 2021, counsel for each party and I participated in a telephone conference.<sup>5</sup> Respondent Wynnewood did not file an objection to Complainant’s Motion for Default as to Wynnewood.

### DISCUSSION

Failure to file a timely answer or failure to deny or otherwise respond to allegations in the Complaint shall be deemed, for purposes of this proceeding, an admission of the allegations in the Complaint, unless the parties have agreed to a consent decision. 7 C.F.R. § 1.136(c). Other than for the filing of a consent decision, the Rules of Practice do not provide for exceptions to the regulatory consequences of an untimely filed answer where, as in the present case, no meritorious objections have been filed.<sup>6</sup>

There is no issue that Respondent Wynnewood failed to file a timely answer to the

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Mr. Card represents Respondent Wynnewood in the Answer to Amended Complaint.” *See Id.*, fn. 3.

<sup>4</sup> United States Postal Service records reflect that the Motion for Default as to Respondent Wynnewood and Proposed Decision as to Respondent Wynnewood were sent to Respondent’s counsel via certified mail and delivered on March 8, 2021. Respondent had twenty (20) days from the date of service to file objections thereto. 7 C.F.R. § 1.139. Weekends and federal holidays shall not be included in the count; however, if the due date falls on a Saturday, Sunday, or federal holiday, the last day for timely filing shall be the following workday. 7 C.F.R. § 1.147(h). In this case, Respondent’s objections were due by March 29, 2021. As of this date, Respondent Wynnewood has not filed a response.

<sup>5</sup> *See* February 25, 2021 Telephone Conference Summary.

<sup>6</sup> 7 C.F.R. § 1.139. *See also supra* note 4.

Amended Complaint.<sup>7</sup> Further, as Complainant points out in its Motion for Default as to Respondents Jeffrey and Lauren Lowe, at 2, all three Respondents' Answer to the Amended Complaint was two days late and comprised of "2 pages, simply 'denies' all of the material allegations of the amended complaint, without more." Complaint's Motion for Default as to Respondents Jeffrey and Lauren Lowe and Respondents' Motion to Amend Answer will be ruled upon in a separate order.

As Respondent Wynnewood failed to timely answer the Amended Complaint, and upon Complainant's motion for the issuance of a decision without hearing by reason of default, this Decision and Order is issued without further procedure or hearing pursuant to section 1.139 of the Rules of Practice (7 C.F.R. § 1.139).

### **Findings of Fact**

1. Respondent Greater Wynnewood Exotic Animal Park, LLC ("Wynnewood"), is an Oklahoma limited liability company (No. 3512540993) whose registered address is 25803

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<sup>7</sup> Respondent, who is represented by counsel, failed to file a timely answer to the amended complaint despite clear reminders of the Rules of Practice. *See* January 26, 2021 Hearing Clerk's Letter stating "**The rules specify that you have 20 days from the receipt of this letter to file with the Hearing Clerk your written Answer to the Complaint signed by you or your attorney of record.**" (Emphasis in original). *See also* October 27, 2020 Sua Sponte Order Suspending Order Setting Deadlines For Submissions and Amending Case Caption, stating at 1, fn. 1, "I note that answers previously filed in response to the original Complaint in Dockets 20-J-0152 and 20-J-0153 cannot operate as a response to the Amended Complaint as the Amended Complaint serves as the 'operative pleading.' (See Judicial Officer's Feb. 25, 2020, 'Decision and Order Setting Aside Default and Remanding for Further Proceedings' at 6, *Green*, USDA Docket No. 17-0205, available at [https://oalj.oha.usda.gov/sites/default/files/JODO%20-%2017-0205\\_Redacted.pdf](https://oalj.oha.usda.gov/sites/default/files/JODO%20-%2017-0205_Redacted.pdf) (last visited Oct. 27, 2020) (citing and quoting *Walker*, 65 Agric. Dec. 932, 966 (U.S.D.A. 2006) ('Thus, the record clearly establishes that the operative pleading is in this proceeding is the Amended Complaint, not the Complaint, and Respondent's response to the Complaint does not operate as a response to the Amended Complaint.'); *Foley*, 59 Agric. Dec. 581, 599 (U.S.D.A. 2000))." *See also Alexander*, 2017 WL 3284715, at \*2 (U.S.D.A. 2017) ("The Rules of Practice do not provide that a default decision may be set aside for excusable neglect") (citing *Noel*, 58 Agric. Dec. 130, 148 (U.S.D.A. 1999)).

North Country Road 3250, Wynnewood, Oklahoma 73098, and whose registered agent is Secretary of State, 421 N.W. 13th Street, Suite 210, Oklahoma City, Oklahoma 73103. At all times mentioned in the amended complaint, respondent Wynnewood was an exhibitor, as that term is defined in the AWA and the Regulations, and did not hold an AWA license.

2. The gravity of the violations alleged in the amended complaint is great. They include the failure and/or refusal to provide access to APHIS inspectors for the purpose of conducting inspections to determine compliance with the AWA, the Regulations, and the standards issued under the Act (9 C.F.R. Part 3) (“Standards”); the failure to employ an attending veterinarian, and repeated failures to make, keep, and maintain records or forms that fully and correctly disclose the acquisition and disposition of animals; failure to handle animals carefully; and failure to provide adequate veterinary care to animals, resulting in harm to those animals.

### **Conclusions**

1. The Secretary of Agriculture has jurisdiction in this matter.
2. On or about the following dates, Respondent Wynnewood willfully violated the veterinary care Regulations (9 C.F.R. § 2.40, *et seq.*) as specified below:
  - a. On or about November 16, 2017, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals and failed to establish and maintain programs of adequate veterinary care that included the use of appropriate methods to prevent injury and disease. Specifically, Respondent failed to obtain veterinary medical care for a tiger cub (Vegas) and a liger cub (Paisley) who were underweight with sunken bellies and protruding hip bones, and had bloody diarrhea. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).

- b. On or about November 16, 2017, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals and failed to establish and maintain programs of adequate veterinary care that included the use of appropriate methods to prevent injury and disease. Specifically, Respondent failed to obtain veterinary medical care for a lemur (Clutch) with visible areas of hair loss on the base of her tail. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
- c. Between June 29, 2018, and September 8, 2020, Respondent failed to employ an attending veterinarian to provide adequate veterinary care to their animals, as required, and failed to establish and maintain programs of adequate veterinary care that included the use of appropriate methods to prevent injury and disease, daily observation of all animals to assess their health and well-being, and a mechanism of communication with the attending veterinarian. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), (b)(3).
- d. On or about September 4, 2018, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to personnel involved in the care and use of animals, and specifically, Respondent failed to provide adequate veterinary care to a liger (Django) who had ingested a blanket and had been vomiting for two days. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3), 2.40(b)(4).
- e. On or about December 20, 2018, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate

- facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to personnel involved in the care and use of animals, and specifically, Respondent failed to provide adequate veterinary care to a tiger (Promise) who had visible pressure sores on both hips and on his left stifle. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3), 2.40(b)(4).
- f. On or about March 1, 2019, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to personnel involved in the care and use of animals, and specifically, Respondent failed to provide adequate veterinary care to a tiger (Petunia) who was lethargic and inappetent. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3), 2.40(b)(4).
- g. On or about June 13, 2020, Respondent failed to obtain adequate veterinary care for a lion-tiger hybrid (Young Yi) who died on approximately June 13, 2020. Specifically, Respondent had not observed Young Yi, did not communicate with a veterinarian regarding Young Yi, did not obtain any veterinary care for Young Yi before he died, nor did they have a necropsy performed to determine the cause of the Young Yi's death. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3).
- h. On or about June 22, 2020, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals and failed to establish and maintain programs of adequate veterinary care that included the use of appropriate methods to prevent injury and disease, and specifically, Respondent failed to obtain veterinary

- medical care for a lion cub (Nala) who was observed to be lethargic and immobile, and to have a purulent nasal discharge, an ocular green discharge, and shallow, rapid respiration. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3).
- i. For several weeks preceding June 17, 2020, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to personnel involved in the care and use of animals, and specifically, Respondent failed to provide adequate veterinary care to two geriatric wolves in obvious need of veterinary care until June 16, 2020. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3), 2.40(b)(4).
  - j. Beginning on or about June 22, 2020, and continuing through July 8, 2020, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals, and to establish and maintain programs of adequate veterinary care that included daily observation, and communication with Respondent's attending veterinarian, and specifically, Respondent failed to communicate to the attending veterinarian concerning a lame fisher cat. 9 C.F.R. §§ 2.40(a), 2.40(b)(1), 2.40(b)(2), 2.40(b)(3).
  - k. On or about June 22, 2020, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals, to establish and maintain programs of adequate veterinary care that included daily observation, and communication with Respondent's attending veterinarian, and to establish and maintain a program of adequate veterinary care that included the availability of appropriate services and

adequate guidance to personnel involved in the care and use of animals regarding an adequate nutritional and parasite control program, and specifically, Respondent failed to obtain adequate veterinary care for two emaciated and aggressive bears. 9 C.F.R. §§ 2.40(a), 2.40(b)(2), 2.40(b)(3).

- l. For several months preceding June 19, 2020, Respondent failed to have an attending veterinarian provide adequate veterinary care to their animals, and to establish and maintain programs of adequate veterinary care that included daily observation, and communication with Respondent's attending veterinarian, and specifically, Respondent failed to communicate to the attending veterinarian concerning a female tiger (Dot) who had had three litters of stillbirths, and failed to treat Dot or to have Dot seen by a veterinarian until June 19, 2020. 9 C.F.R. §§ 2.40(a), 2.40(b)(1), 2.40(b)(2), 2.40(b)(3).
- m. For several months preceding July 8, 2020, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to personnel involved in the care and use of animals, and specifically failed to follow the recommendations of a veterinarian who examined a liger (Ayeesha) on or about June 24, 2020. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
- n. Between June 16, 2020, and July 8, 2020, Respondent failed to establish and maintain programs of adequate veterinary care that included the availability of appropriate facilities, personnel, equipment, and services, the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and adequate guidance to

- personnel involved in the care and use of animals, and specifically failed to follow the recommendations of a veterinarian who examined two geriatric wolves on June 16, 2020. 9 C.F.R. §§ 2.40(a), 2.40(b)(2).
3. Between March 2017 and November 2017, Respondent willfully violated the Regulations by failing to notify APHIS of a change of address in their business operation, and of additional sites where Respondent housed animals. 9 C.F.R. §§ 2.8, 2.27.
  4. Between March 2017, and November 2017, Respondent willfully violated section 16 of the Act (7 U.S.C. § 2146) and section 2.126 of the Regulations (9 C.F.R. § 2.126), by failing to notify APHIS of a change in site, which prevented APHIS from conducting a complete inspection of Respondent's facilities and animals.
  5. Between July 2017, and November 16, 2017, Respondent willfully violated the Regulations by exhibiting animals at a location other than Respondent's facility, and housing those animals overnight at that location, without having timely submitted a complete and accurate itinerary to APHIS. 9 C.F.R. § 2.126(c).
  6. On or about October 23, 2017, Respondent willfully violated the Regulations by failing to make, keep, and maintain records or forms that fully and correctly disclose the disposition of one tiger. 9 C.F.R. § 2.75(b).
  7. On or about March 7, 2018, Respondent willfully violated the Regulations by failing to make, keep, and maintain records or forms that fully and correctly disclose the disposition of one tiger and one lemur. 9 C.F.R. § 2.75(b).
  8. On or about August 30, 2018, Respondent willfully violated the Regulations by failing to make, keep, and maintain records or forms that fully and correctly disclosed the acquisition of two tigers (Forrest and Enzo), one cougar, and one Canadian lynx. 9 C.F.R. § 2.75(b).

9. On or about February 20, 2019, Respondent willfully violated the Regulations by failing to make, keep, and maintain records or forms that fully and correctly disclosed the disposition of a liger, lemur, and tiger. 9 C.F.R. § 2.75(b)(1).
10. On or about June 22, 2020, Respondent willfully violated the Regulations by failing to have a copy of their program of veterinary care available for inspection. 9 C.F.R. §§ 2.75(b)(3), 2.126(a).
11. On or about June 26, 2020, Respondent willfully violated the Regulations by providing to APHIS three false veterinarian records on Young Yi, and refusing to permit APHIS to examine legitimate records required to be kept by the AWA. 9 C.F.R. § 2.126(a)(2).
12. On or about July 8, 2020, Respondent willfully violated the Regulations (9 C.F.R. § 2.75(b)), by failing to make, keep, and maintain records or forms that fully and correctly disclosed the acquisition of the following nine animals: two armadillos; two caracals; one ocelot; three tigers (Medusa, Filet, and Mudcat); and one liger (Mani).
13. On or about July 8, 2020, Respondent willfully violated the Regulations (9 C.F.R. § 2.75(b)), by failing to make, keep, and maintain records or forms that fully and correctly disclose the disposition of the following twenty-five animals: one capybara; two baboons; one prehensile-tailed porcupine; one red-ruffed lemur; one male kinkajou; eight prairie dogs; three bats; one Fisher Cat; one sloth; one wolf (Sky); four tigers (Rheque, Amarouk, Tess, and Jughead); and one liger (Lizzy).
14. On or about the following dates, Respondent willfully violated the handling Regulations (9 C.F.R. § 2.131):
  - a. On or about April 6, 2017, Respondent failed to handle a tiger and bear cub during public exhibition so there was minimal risk of harm to the animal and to the public,

- with sufficient distance and/or barriers between the tiger and bear cubs and the general viewing public so as to assure the safety of animals and the public.
- Specifically, Respondent had no barrier around these animals' enclosure, which permitted the public to make direct contact with the animals. 9 C.F.R. § 2.131(c)(1).
- b. On or about May 4, 2017, Respondent failed to handle two tiger cubs, during public exhibition so there was minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the tigers and the general viewing public so as to assure the safety of animals and the public. Specifically, Respondent had no barrier around the tiger cubs' enclosure, which permitted the public to make direct contact with the animals. 9 C.F.R. § 2.131(c)(1).
- c. Between April 5, 2017, and May 5, 2017, Respondent failed to handle a tiger and bear cub during public exhibition so there was minimal risk of harm to the animal and to the public, with sufficient distance and/or barriers between the tiger and bear cubs and the general viewing public so as to assure the safety of animals and the public. Specifically, Respondent had no barrier around the animals' enclosure, which permitted the public to make direct contact with the animals. 9 C.F.R. § 2.131(c)(1).
- d. On or about April 23, 2019, Respondent failed to handle a juvenile tiger, during exhibition, with minimal risk of harm to the animal and the public, and specifically, Respondent exhibited the tiger without any distance or barriers between the animals and the public. 9 C.F.R. § 2.131(c)(1).
- e. On or about June 23, 2020, Respondent failed to handle three juvenile lions during public exhibition so there was minimal risk of harm to the animals and to the public, with sufficient distance and/or barriers between the large felids and the general

viewing public so as to assure the safety of animals and the public. Specifically, one of the female lions climbed on top of a portable shelter in the lock-out area, which effectively reduced the height of the barrier between the tigers and the public to four feet, and offered a potential means for a lion or lions to exit the enclosure. 9 C.F.R. §§ 2.131(b)(1), 2.131(c)(1).

15. On or about March 2, 2020, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to meet the Standards, and specifically, Respondent housed a tiger (Jughead) in one enclosure and a male and female tiger in the neighboring enclosure that were not constructed of such material and strength as appropriate for those species, and in a manner that would contain those animals. 9 C.F.R. § 3.125(a).

16. On or about June 22, 2020, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to meet the Standards, as follows:

- a. Respondent housed two wolves, an African porcupine, a fisher cat, a kangaroo, and a tiger in enclosures that were in disrepair, or otherwise failed to meet the minimum Standards. 9 C.F.R. § 3.125(a).
- b. Respondent failed to maintain a safe and effective program for the control of insects, ectoparasites, and avian and mammalian pests, which affected the health and well-being of numerous tigers, lions, and wolves. 9 C.F.R. § 3.131(d).

17. Between approximately January 1, 2020, and September 8, 2020, Respondent willfully violated the Regulations, 9 C.F.R. § 2.100(a), by failing to meet the Standards, as follows:

- a. Respondent housed a tiger in an enclosure that had a metal reinforcement no longer closely adhered to the fence, thereby creating a gap between it and the fence that could entrap a foot or limb and collect debris or organic matter. 9 C.F.R. § 3.125(a).

- b. Respondent failed to provide food that was wholesome, palatable, and free from contamination and of sufficient quantity and nutritive value to maintain all animals in good health. 9 C.F.R. § 3.129(a).

### **ORDER**

1. Complainant's Motion for Adoption of Decision and Order by Reason of Default as to Respondent Greater Wynnewood Exotic Animal Park, LLC is GRANTED IN PART.<sup>8</sup>
2. Respondent Wynnewood, its agents and employees, successors and assigns, directly or through any corporate or other device, shall cease and desist from violating the Act and the Regulations and Standards.

This Decision and Order shall be final and effective without further proceedings thirty-five (35) days after service unless an appeal to the Judicial Officer is filed with the Hearing Clerk within thirty (30) days after service, as provided in sections 1.139 and 1.145 of the Rules of Practice (7 C.F.R. §§ 1.139 and 1.145).

Copies of this Decision and Order shall be served by the Hearing Clerk upon each of the parties.

Done at Washington, D.C.,  
this 31st day of March 2021

Channing D. Strother  
Chief Administrative Law Judge

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<sup>8</sup> Complainant's proposed Decision and Order as to Respondent Greater Wynnewood Exotic Animal Park, LLC is not adopted verbatim but has been used to inform this Decision and Order.

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