

UNITED STATES DEPARTMENT OF AGRICULTURE
BEFORE THE SECRETARY OF AGRICULTURE

In re:

Jungle Friends Primate Sanctuary,
Inc., a Florida corporation,

Respondent.

AWA Docket No. 26-J-0113

COMPLAINT

REC'D - USDA/OALJ/HCO
2026 SEPT 3 9:21 AM

There is reason to believe that the Jungle Friends Primate Sanctuary, Inc., a Florida corporation, named herein has willfully violated the Animal Welfare Act, as amended (7 U.S.C. § 2131 *et seq.*) (“AWA” or “Act”), and the regulations promulgated thereunder (9 C.F.R. Part 2 and 3) (“Regulations” and “Standards”). Therefore, the Administrator of the Animal and Plant Health Inspection Service (“APHIS”) issues this Complaint alleging the following:

JURISDICTIONAL ALLEGATIONS

1. Respondent Jungle Friends Primate Sanctuary, Inc. (herein “Respondent”) is a Florida Corporation, registered in the state of Florida, whose principal address is 13915 North SR 121 Gainesville, Florida 32653.
2. Respondent’s registered agent is Karen S. Bagnall whose address is 13915 North SR 121 Gainesville, Florida 32653.
3. At all times mentioned herein, the Respondent acted as an Exhibitor, as that term is defined in the Act and the Regulations.
4. At all times material herein, the Respondent possessed AWA Class C license 58-C-0667.

ALLEGED VIOLATIONS

1. On or about September 29, 2021, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) Respondent failed to provide food to nonhuman primates that was clean, wholesome, and palatable, in violation of 9 C.F.R. § 3.82(a).

(b) Respondent failed to establish and maintain an effective program of pest control, in violation of 9 C.F.R. § 3.84(d).

2. On or about February 3, 2022, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows: Respondent failed to clean as often as necessary the spider monkey enclosure to prevent an excessive accumulation of feces and food waste, in violation of 9 C.F.R. § 3.84(a).

3. On or about January 24, 2023, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) Respondent failed to keep several enclosures for its nonhuman primates free of excessive rust that prevents the required cleaning and sanitization, or that affects the structural strength of the surface, in violation of 9 C.F.R. § 3.75(c)(1)(i).

(b) Respondent failed to clean as often as necessary the spider monkey and capuchin enclosures to prevent an excessive accumulation of feces and food waste, in violation of 9 C.F.R. § 3.84(a).

4. On or about August 17, 2023, the Respondent willfully violated the Regulations (9 C.F.R. § 2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observation of

animals, as follows: On June 28, 2023, a cotton top tamarin was found deceased in her enclosure, following a lack of adequate veterinary care and daily observation, in violation of 9 C.F.R. § 2.40(b)(2); 9 C.F.R. § 2.40(b)(3).

5. On or about August 17, 2023, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) Respondent failed to provide food to non-human primates that was clean, wholesome, and palatable, in violation of 9 C.F.R. § 3.82(a).

(b) Respondent failed to establish and maintain an effective program of pest control, in violation of 9 C.F.R. § 3.84(c).

6. On or about November 29, 2023, the Respondent willfully violated the Regulations (9 C.F.R. § 2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observation of animals, as follows: A capuchin monkey was receiving twice the medical dose as originally prescribed of an expired medication, in violation of 9 C.F.R. § 2.40(b)(2).

7. On or about November 29, 2023, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows: Respondent failed to provide food to nonhuman primates that was clean, wholesome, and palatable, in violation of 9 C.F.R. § 3.82(a).

8. On or about May 6, 2024, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows: Respondent failed to keep several enclosures for its nonhuman primates free of excessive rust that prevents the required

cleaning and sanitization, or that affects the structural strength of the surface, in violation of 9 C.F.R § 3.75(c)(1)(i).

9. On or about December 16, 2024, the Respondent willfully violated the Regulations (9 C.F.R. § 2.40) by failing to provide adequate veterinary care to animals and/or failing to establish and maintain programs of adequate veterinary care that included appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and/or daily observation of animals, as follows: In June 2024, at least one brown capuchin “Golden Child” did not receive adequate veterinary care following a fight with his cage mate, in violation of 9 C.F.R. § 2.40(b)(2).

10. On or about May 12, 2025, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) In April 2025 a common marmoset “Raja” was found with his leg stuck in the wire floor of his outdoor runway, in violation of 9 C.F.R. § 3.80(a)(2)(x).

(b) In April 2025, Respondent failed to establish and maintain a safe and effective program of pest control that promotes the health and well-being of the animals, in violation of 9 C.F.R. § 3.84(d).

11. On or about August 12, 2025, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) Respondent failed to keep several enclosures for its nonhuman primates free of excessive rust that prevents the required cleaning and sanitization, or that affects the structural strength of the surface, in violation of 9 C.F.R § 3.75(c)(1)(i).

(b) Respondent failed to establish and maintain an effective program of pest control, in violation of 9 C.F.R. § 3.84(d).

12. On or about December 8, 2025, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows:

(a) Respondent failed to keep several enclosures for nonhuman primates in good repair so that they protect the animals from injury, in violation 9 C.F.R § 3.75(a).

(b) Respondent failed to clean as often as necessary the capuchin enclosure to prevent an excessive accumulation of feces and food waste, in violation of 9 C.F.R § 3.75(c)(3).

13. On or about June 9, 2026, the Respondent willfully violated the Regulations (9 C.F.R. § 2.100(a)), by failing to meet the Standards, as follows: Respondent failed to keep an enclosure for its nonhuman primates free of excessive rust that prevents the required cleaning and sanitization, or that affects the structural strength of the surface, in violation of 9 C.F.R § 3.75(c)(1)(i).

WHEREFORE, it is hereby ordered that for the purpose of determining whether the Respondent has, in fact, violated the Act and Regulations promulgated thereunder, this Complaint shall be served upon the Respondent. Respondent shall have twenty (20) days after service of this Complaint in which to file an answer with the Hearing Clerk, either by electronic mail at: SM.OHA.HearingClerks@USDA.GOV, or by mail at the Office of the Hearing Clerk, Room 1031 - South Building, United States Department of Agriculture, 1400 Independence Avenue, SW, Washington, DC 20250-9200, in accordance with the applicable Rules of Practice (7 C.F.R. § 1.136). Failure to deny or otherwise respond to any allegation in this Complaint shall constitute an admission of the allegation. Failure to file an answer within the prescribed time shall constitute an admission of the allegations in this Complaint and a waiver of hearing. APHIS requests that this matter proceed in accordance with the Rules of Practice governing

proceedings under the Act, and that such order or orders be issued as are authorized by the Act (7 U.S.C. § 2149) and warranted under the circumstances.

Done at Washington, D.C.
this ____ day of _____ 2026

KELLY MOORE

Digitally signed by KELLY
MOORE
Date: 2026.09.02 11:45:00 -04'00'

Kelly Moore
Administrator
Animal and Plant Health Inspection Service

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