

**Interim Report  
10-41 Special Project Review – Giraffe**

**City of Tulsa  
Internal Auditing  
January 2010**





**Preston L. Doerflinger, City Auditor**  
**OFFICE OF THE CITY AUDITOR**

January 29, 2010

To: Distribution List

From: Preston L. Doerflinger

Subject: Internal Audit Interim Report 10-41 Special Project Review – Giraffe

Enclosed is an interim report on a special project requested by the Director of Community Development on behalf of the Mayor. Internal Auditing obtained a total of 237 photographs as part of this project. Compact discs with these photographs have been provided to the Mayor and City Council Offices to make available for their review in conjunction with this report.


We would like to express our appreciation to the members of the Community Development Department, Tulsa Zoo, City Legal Department, Human Resources Department and Chief Risk Officer for their cooperation and assistance with completion of this interim report.

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DATE: January 29, 2010

TO: Preston Doerflinger  
City Auditor

FROM: Ron Maxwell, CIA, CFE  
Chief Internal Auditor 

SUBJECT: Interim Report  
10-41 Special Project Review-Giraffe

### **INTRODUCTION AND SCOPE**

On December 16, 2009, the Director of Community Development, on behalf of the Mayor, requested the City Auditor to investigate the details surrounding the recent death of a giraffe (Amali) delivered on October 18, 2009 to the Tulsa Zoo. The scope of the review included determining details of the animal's condition upon departure from its originating zoo (The Wilds), during transport and arrival at the Tulsa Zoo. Following is an interim report on this request.

### **CONDITION AT SELLER DELIVERY**

Documentation supports that Amali appeared to be healthy and overall body condition was good at the time of seller delivery and loading into the transporter company equipment on October 16, 2009. (Exhibit 1 Health Records-The Wilds) (Exhibit 2 Email from Director of Animal Management, The Wilds to Tulsa Zoo Large Mammal Curator dated 10/16/2009)

### **INTERVIEW WITH TRANSPORTER**

Interview with the transporter company driver is pending arrangements with the transporter company for an interview. The City Legal Department issued a spoliation letter on January 22, 2010 requesting the transporter company to maintain and preserve documentation and evidence regarding the transport. The "Tulsa Zoo Giraffe Incident Report" prepared by the Tulsa Zoo Staff Veterinarian and Zoo Director dated November 19, 2009 (Exhibit 3) states in part: no injury was evident during the transport inspections and the transport driver reported no incident he was aware of during the transport that would have caused the injury.

### **USDA FOCUSED INSPECTIONS**

On November 20, 2009 the Zoo Director sent the "Tulsa Zoo Giraffe Incident Report" to the USDA/APHIS/AC Western Region and a follow-up letter was sent on November 21, 2009 regarding the transfer of Amali to the Tulsa Zoo. On December 18, 2009 the Zoo Director formally lodged a complaint with the USDA/APHIS/AC Western Region regarding the transport. On December 21, 2009 the USDA informed the Zoo Director the complaint was issued number W10-044 and assured the USDA would look into the concerns and take appropriate action if necessary. The Zoo Director spoke with the Supervisory Animal Care Specialist; USDA Western Region who informed that after 30-60 days a response from the USDA can be requested through the Freedom of Information Act regarding the complaint.

The Zoo Director made a Freedom of Information Act request on January 7, 2010 for results of the focused inspection conducted by the USDA at the Tulsa Zoo on November 25, 2009 and the results of focused inspections of The Wilds and the transporter company. On January 19, 2010, the Zoo Director made a Freedom of Information Act request for results of findings for complaint W10-044 filed by the Tulsa Zoo. Freedom of Information Act Specialists with the USDA responded on January 8, 2010 and January 19, 2010 that the USDA currently has a considerable backlog of Freedom of Information Act requests and that the requests made by the Zoo Director will be processed as soon as possible. (Exhibit 4 USDA Complaint Information)

### **ZOO RECEIPT DOCUMENTATION**

Zoo receipt documentation contains conflicting information regarding Amali's condition at the time of delivery by the transporter company and unloading at the Tulsa Zoo.

(Exhibit 5 USDA Record of Disposition dated 10/16/2009 signed by Tulsa Zoo Large Mammal Curator 10/18/2009)

(Exhibit 6 Memo dated 12/16/2009 from Large Mammal Curator to Zoo Director)

Interview statements were obtained from the Zoo Director, Staff Veterinarian and Large Mammal Curator regarding the standard practices of the Tulsa Zoo for animal receipt examinations. There is no written policy, procedure or checklist for the animal receipt examinations. The interview statements were consistent in describing the standard practices as follows. Depending on who is on duty, the Zoo Director, Staff Veterinarian or Curator will evaluate condition of the animal. The examinations are usually just visual for large animals to determine the animal is alive, appears normal, if there are signs of injury such as broken bones/legs, major cuts or wounds, whether the animal is walking and behaving normally. Subsequent to receipt, stool and other samples are taken to determine if the animal has any parasites, infectious diseases or other health conditions.

### **PRELIMINARY INTERVIEWS AND WITNESS STATEMENTS**

Interviews and/or witness statements were obtained from twelve of thirteen persons present during the delivery and unloading of Amali on October 18, 2009. The Zoo Director was also interviewed but was not present during the delivery. These interviews or witness statements included ten City staff and three non-City staff. As noted above, interview with the transporter company driver is pending.

Preliminary interview results determined there are two witnesses who provided statements of observations of the neck misalignment before Amali entered the giraffe barn at the Tulsa Zoo. Other persons interviewed or providing witness statements who observed the neck misalignment did not notice it until Amali was in the giraffe barn at the Tulsa Zoo. Several witnesses commented their view was obstructed by wooden panels they were holding to form a chute between the trailer and the giraffe barn door during the unloading.

The first witness of the neck misalignment was the Tulsa Zoo Staff Veterinarian. After the transporter truck and trailer entered Zoo premises, before the driver got back to the giraffe barn, he stopped so the Staff Veterinarian could look at the giraffe. The Staff Veterinarian entered the trailer to administer medication while the truck and trailer were stopped before reaching the giraffe barn and before Amali exited the trailer. The Staff Veterinarian first observed the neck misalignment at that time. The Staff Veterinarian stated the neck misalignment was present

when the Staff Veterinarian looked at the giraffe in the trailer. (See Series of photographs from PICT 0007 to PICT 0019 in the Photograph Summary at Appendix I.)

The second witness of the neck misalignment before Amali entered the giraffe barn was a member of Tulsa Zoo Friends Operations who was present at the time of the delivery. The Tulsa Zoo Friends Operations member provided witness statement of observation of the neck misalignment once Amali was out of the trailer but before she entered the giraffe barn. The Tulsa Zoo Friends Operations member stated observation of the neck misalignment when Amali looked over a panel the Tulsa Zoo Friends Operations member was holding to assist with the unloading.

Eight other witnesses stated their first observations of the neck misalignment were not until Amali was inside the Tulsa Zoo giraffe barn. Eight witnesses stated they heard the transporter truck driver express that Amali did not settle down, ride well or travel well during the trip.

Five witnesses stated they observed Amali's ossicones (horns) were abraded and bloodied. Five witnesses stated they observed there were some blood marks in the trailer on the roof or that the top of the trailer was bloody (See PICT 0018 plus several others as noted on the Photograph Summary at Appendix I). Five witnesses stated they observed abrasions on Amali's face and rump (See PICT 0097 plus several others as noted on the Photograph Summary at Appendix I). The Staff Veterinarian stated the abrasions were superficial; that the abrasions and blood marks were not considered unusual and that animals may sometimes rub themselves during transport. The Staff Veterinarian was informed the animal was moving around in the trailer and stated the abrasions could have been incurred at the same time as the neck injury but they do not necessarily have to. The Staff Veterinarian stated the abrasions could possibly relate to the neck misalignment. However, the Staff Veterinarian also stated the animal could have just been circling in the trailer and raising her head up and caused the abrasions.

### **OTHER OBSERVATIONS**

Documentation of the Tulsa Zoo Policies and Procedures could assist Zoo staff and improve operations. Zoo staff interviewed stated the Tulsa Zoo does not have written policies or procedures regarding:

- Zoo staff responsible for checking condition when animals are received
- Procedures and a checklist for examining the condition of animals received by the Zoo
- Zoo staff who are authorized to sign acceptance documentation for receipt of animals
- Policy regarding taking of photographs pertaining to Zoo operations
- Insurance coverage for animal transports.

### **Recommendation:**

Zoo management should develop written policies and procedures for approval by the Zoo governing body to improve guidance for Zoo staff and to improve Zoo operations.

**EXHIBIT 1**

**HEALTH RECORDS  
THE WILDS**

Report Start Date  
1/1/1900

# Specimen Report for WILDS / 104046

Report End Date  
10/15/2009



Taxonomic name: *Giraffa camelopardalis rothschildi*

Family: Giraffidae

Common name: Baringo giraffe

Order: Artiodactyla

## Current information

Sex:	Female	Sire ID:	101022 at The Wilds
Birth type:	Captive Born	Dam ID:	MM0608 at The Wilds
Birth Location:	The Wilds	Rearing:	Parent
Birthdate-Age:	26 Sep 2004 - 5Y,0M,18D	Hybrid:	Not a hybrid
Time since last Acq:	5Y,0M,18D as of report end date		

<u>Date in</u>	<u>Acquisition - Vendor/local Id</u>	<u>Holder</u>	<u>Disposition - Recipient/local Id</u>	<u>Date out</u>
26 Sep 2004	Birth	WILDS / 104046		

<u>Date</u>	<u>Identifier type</u>	<u>Identifier</u>	<u>Location</u>	<u>Comments</u>
26 Sep 2004	House Name	Asha		
15 Sep 2009	Regional Studbook #	2979	AZA	

<u>Date</u>	<u>Note type</u>	<u>Comments</u>
26 Sep 2004	Birth note	Morgan gave birth to a healthy calf 104046 in 2 1/2 hours in the giraffe yard. Morgan and Asha doing well.
5 Apr 2005	Animal management note	Gerald mixed with 0.6 giraffe with no problems.  This comment was added to the following specimens: 101022, 102028, 104029, 104030, 104046, 940516, MM0608.
14 Apr 2005	Note	Morgan allowed both Pogo and Asha to nurse for a few minutes together. Pogo is almost 3 years old and not her calf. Although she allowed Pogo to nurse from her when she was younger with the same age calf. Mickey 940516 0.1 ret. giraffe with run to break up the nursing whenever she see it occurring.  This comment was added to the following specimens: 102028, 104046, MM0608.
1 May 2005	Reproductive behavior	Gerald sniffing and following Asha around the yard several times.  This comment was added to the following specimens: 101022, 104046.
8 May 2005	Animal management note	Morgan and Asha moved to Eastern Expansion with the help of Mickey.  This comment was added to the following specimens: 104046, MM0608.
31 Oct 2005	Animal management note	Mixed 0.7 Giraffe inside the Giraffe Barn. Rahna (105055) immediately chased 0.2 Massai 104030 and 104029, and 0.1 Roth. 104046 for a couple of minutes, and then ignored them for the rest of the day. All four adults sniffed each other and then went on about their daily business.  This comment was added to the following specimens: 104029, 104030, 104046, 105054, 105055, 940516, MM0608.
1 Nov 2005	Note	0.7 Giraffe given access outside. Rahna (105055) the only one that appeared nervous.  This comment was added to the following specimens: 104029, 104030, 104046, 105054, 105055, 940516, MM0608.
6 Feb 2006	Medical note	0.1 Roth Giraffe, Asha 104046, separated from herd for fasting. Hoof trim scheduled for 2/8/06.
8 Feb 2006	Medical note	0.1 Roth Giraffe, Asha 104046, immobilized for a hoof trim. The procedure went very well. A human backboard was used to stabilize her head in an upright position with the use of a stepladder. A grinder was used to trim her rear hooves. Other than the expected recycling of Metatomadine drug, she was darted with reversal and behaved fine.
29 Mar 2006	Medical note	0.1 Giraffe "Asha" 104046 lame on front left hoof.
4 Apr 2006	Medical note	0.1 Giraffe "Asha" 104046 - rear hooves growing extra long and flat. Her front right medial toe is long.
24 Jun 2006	Note	Mixed 0.3 Giraffe 106024, 104046 and MM 0608 together with no problems.



		This comment was added to the following specimens: 104046, 106024, MM0608.
16 Jul 2006	Medical note	0.1 Giraffe, Asha 104046, separated for procedure scheduled for 7/18/06.
18 Jul 2006	Medical note	Immobilized 0.1 Giraffe, Asha 104046, for hoof trim.
16 Jan 2007	Medical note	Immobilized 0.1 Giraffe, Asha 104046, for hoof trim.
26 Feb 2007	Aggression	0.2 Giraffe, Mickey 940516 and Asha 104046, were bothering 0.2 Giraffe Geraldine 106054 and Morgan MM0608, during nursing.
		This comment was added to the following specimens: 104046, 106054, 940516, MM0608.
14 May 2007	Aggression	0.1 R. Giraffe, Asha 104046, kicked and knocked down 0.1 R/ Giraffe, Geraldine 106054, while she was trying to nurse.
		This comment was added to the following specimens: 104046, 106054.
17 May 2007	Medical note	0.1 R. Giraffe, Asha 104046, immobilized for hoof trim.
20 Feb 2008	Medical note	0.6 Giraffe were squeezed in chuteway for antibiotic injections - first of two injections.
		This comment was added to the following specimens: 104029, 104030, 104046, 106024, 106054, 940516.
28 Jan 2009	Reproductive behavior	1.0 Giraffe, L'I Buddy 108049, attempting to breed 0.1 Giraffe, Asha 104046, several times in a 30-minute time period. Did not appear to be successful.
		This comment was added to the following specimens: 104046, 108049.
28 Feb 2009	Reproductive behavior	1.0 Giraffe, Li'l Buddy 108049, mounting 0.1 Giraffe, Asha 108049, without success during observation.
		This comment was added to the following specimens: 104046, 108049.
10 May 2009	Note	0.5 Giraffe moved to East. Exp. brought in on 5/9/09 due to cold temperatures - brought back in the evening of 5/10/09.
		This comment was added to the following specimens: 104030, 104046, 106024, 106054, 940516.
17 May 2009	Note	0.5 Giraffe moved back to Giraffe Barn due to cold weather.
		This comment was added to the following specimens: 104030, 104046, 106024, 106054, 940516.
11 Jun 2009	Reproductive behavior	1.0 Giraffe, L'il Buddy 108049, mounted 0.1 Giraffe, Asha 104046.
		This comment was added to the following specimens: 104046, 108049.

<u>Date</u>	<u>Enclosure</u>	<u>Reason</u>
26 Sep 2004	GIR BARN	birth
6 May 2005	EAST EXP	exhibit
11 Jun 2005	PAST A	exhibit
25 Jun 2005	PAST D	exhibit
21 Oct 2005	GIR BARN	Batch Enclosure Move
2 May 2006	PAST A	Batch Enclosure Move
11 May 2006	PAST D	Batch Enclosure Move
9 Jun 2006	PAST A	
23 Jun 2006	GIR BARN	0.1 giraffe Asha, 104046, moved back to giraffe barn due to overgrown hooves.
18 May 2007	EAST EXP	
21 May 2007	PAST A	Batch Enclosure Move
24 May 2007	PAST D	Batch Enclosure Move
11 Oct 2007	EAST EXP	Batch Enclosure Move
11 Oct 2007	GIR BARN	1.6 Giraffe moved to Giraffe Barn due to cold weather



Report Start Date  
1/1/1900

# Specimen Report for WILDS / 104046

Report End Date  
10/15/2009



16 Oct 2007	EAST EXP	Batch Enclosure Move
23 Oct 2007	GIR BARN	1.6 Giraffe moved to barn due to weather.
7 May 2008	EAST EXP	Batch Enclosure Move
12 May 2008	GIR BARN	0.6 Giraffe moved to Giraffe Barn due to cold weather.
15 May 2008	EAST EXP	Batch Enclosure Move
18 May 2008	GIR BARN	0.6 Giraffe returned to barn due to cold weather.
24 May 2008	EAST EXP	0.6 Giraffe returned to barn due to cold weather.
3 Jun 2008	PAST B	Batch Enclosure Move
4 Jun 2008	PAST D	Batch Enclosure Move
2 Oct 2008	GIR BARN	0.5 Giraffe moved to Giraffbn for the evening. They will go into East Exp during the day and return to barn in the evening until tour season ends, depending on weather.
18 Oct 2008	GIR BARN	Batch Enclosure Move
25 Apr 2009	EAST EXP	Batch Enclosure Move
4 Jun 2009	PAST D	Batch Enclosure Move

<u>Date</u>	<u>Sex</u>	<u>Comments</u>
26 Sep 2004	Female	

<u>Date</u>	<u>Rearing</u>	<u>Comments</u>
26 Sep 2004	Parent	

<u>Date</u>	<u>Parent(s)</u>	<u>local Id</u>	<u>Location</u>	<u>Comments</u>
26 Sep 2004	Sire	101022	WILDS	
26 Sep 2004	Dam	MM0608	WILDS	

Clinical Notes - Individual Specimen Report

I.C.P.W.A. International Center for the

GIRAFFA CAMELOPARDALIS ROTHSCILDI  
Baringo giraffe  
Name: Asha

Sex: Female  
Age: 5Y 0M 19D

Acc. #: 104046  
Birth: 26.Sep.2004

Preservation of wild  
Animals (The Wilds)

....2008...

30.Apr.2008

Rx: FENBENDAZOLE 41250 mg PO SID for 3 days. \*\* group treatment \*\*  
(LB)

30.May.2008

Rx: MOXIDECTIN 250 mg topically for 1 dose. \*\* group treatment \*\*  
(BW)

25.Jul.2008

Rx: MOXIDECTIN 250 mg topically SID for 1 dose. (BW)

24.Sep.2008

Rx: MOXIDECTIN 200 mg topically SID for 1 dose. (LB)

14.Nov.2008

Rx: PROMECTIN B POUR ON FOR CATTLE 175 mg topically SID for 1 dose. \*\*  
group treatment \*\* (LB)

....2009...

11.Jan.2009

Rx: PROMECTIN B POUR ON FOR CATTLE 175 mg topically SID for 1 dose.  
(LB)

23.Mar.2009

Rx: MOXIDECTIN 175 mg topically SID for 1 dose. \*\* group treatment \*\*  
(LB)

15.May.2009

Rx: MOXIDECTIN 200 mg topically SID for 1 dose. \*\* group treatment \*\*  
(RBW)

14.Aug.2009

Rx: MOXIDECTIN 200 mg topically SID (LB)

6.Oct.2009

Fecal float: Strongyle eggs, 154 /g.

A: Low to moderate burden.  
P: Deworm prior to shipment. (BW)

13.Oct.2009

Rx: Moxidectin 200 mg topically. (BW)

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 3Y 8M 16D	Birth: 26.Sep.2004
Name: Asha		

=====

31.Jan.2008

negative or could potentially be a chronic carrier and intermittent shedder.

P: Continue quarantine plan for giraffe and test other animals as well as environmental samples. (RBW)

19.Feb.2008

Hx: Salmonella. Given the persistence of loose stool and the possibility that one animal appears to be demonstrating clinical signs associated with salmonella, a decision was made to treat entire group of giraffe with florfenicol. Florfenicol was chosen as this type of salmonella appears to be susceptible to this antibiotic.

Proc:

1. Wall restraint
2. Florfenicol: 10.8g IM

P: Repeat treatment in 2 days. (RBW)

21.Feb.2008

Hx: Salmonella treatment

Proc:

1. Wall restraint
2. Florfenicol: 10.8g IM

P: Recheck fecal culture in 2-4 weeks. Maintain quarantine procedures until able to demonstrate negative cultures. (RBW)

30.Apr.2008

Rx: FENBENDAZOLE 41250 mg PO SID for 3 days. \*\* group treatment \*\*  
(LB)

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI      Sex: Female      Acc. #: 104046
Baringo giraffe                        Age: 3Y 8M 16D   Birth: 26.Sep.2004
Name: Asha
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18.May.2007

Hx: Recheck post immobilization for foot trim

Proc:

1. Examination at a distance: Animal is BAR and looks relatively comfortable. Over the past 12 hours, she has not demonstrated any evidence of reanarcotization or re-sedation and consequently did not require the administration of any additional reversal agent.

A: Animal appears to have recovered well from anesthesia and foot trim

P: Turn out to pasture E with herd. (RBW)

1.Jul.2007

Rx: MORANTEL TARTRATE (RUMATEL) 8 lb PO SID for 1 day. \*\* group treatment \*\* (LB)

21.Sep.2007

Rx: MOXIDECTIN 450 mg topically SID for 1 dose. (LB)

31.Oct.2007

Rx: IVERMECTIN 1200 mg PO SID for 1 day. \*\* group treatment \*\* (LB)

1.Nov.2007

Rx: FENBENDAZOLE 31750 mg PO SID for 3 days. \*\* group treatment \*\* (RBW)

....2008....

31.Jan.2008

Hx: Intermittant diarrhea. The giraffe group has had intermittent episodes of loose stool since the group had been moved to the giraffe barn for winter management. Fecal egg counts have not been elevated and their diet has been stable including Mazuri Hi-Fiber and Alfalfa hay.

Proc:

1. Examination at a distance: This animal is BAR. The feces produced have are clumped pellets.

2. Fecal culture:

Campylobacter: negative (ODA 2/11/08)

Salmonella - negative (ODA 2/6/08)

A: The absence of salmonella may illustrate that this animal is a true

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 3Y 8M 16D	Birth: 26.Sep.2004
Name: Asha		

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.....2007...

26.Feb.2007

Rx: FENBENDAZOLE 4 gm PO SID for 3 days. \*\* group treatment \*\*  
(RBW)

17.May.2007

Hx: Trim feet

Proc:

1. Immobilization: 4mg thiafentanil, 6mg medetomidine and 500mg ketamine were administered by plastic dart into right hip. The animal achieved recumbancy and light stage 3 anesthesia within 5 minutes. A 20mm ET tube was placed and oxygen was supplemented with hudson demand valve. T 99.9-101.7, P 30-42. The animal was able to spontaneously breath initially but became apneic for the duration of the procedure after 100mg ketamine was administered IV. Oxygen saturation ranged from 94-98% Blood pressure ranged from 128/70/113 to 116/93/105.

2. A 16ga 2" catheter was placed in the left lateral saphenous vein. Ten ml of whole blood was collected for cbc, chem and mineral analysis (msu). PCV 30, TP 7/4, FIB 400. TWBC 12,705 60% neutrophils, 2% bands, 15% lymphocytes, 8% monocytes, 13% eosinophils, 2% basophils. alp 397, ast 72, ck 1033, ggt 23, alb 3.1, tp 7.4, glob 4.3, tb 0.5, db 0.3, bun 16, cr 1.3, chol 33, glu 88, ca 8.9, p 7.4, tco2 12, cl 107, k 4.2, na 142, a/g ratio 0.7, b/c ratio 12/3, ib 0.2, na/k ratio 34, anion gap 27.

3. Exam: EENT wnl, heart and lungs auscult wnl, animal is in good body condition.

4. Trim feet: Feet were trimmed back aggressively to achieve normal foot conformation.

5. Ancillary treatment:

Rx: 2 liters LRS were administered IV over 1.5 hours

Rx: Ivermectin 100 mg SC

Rx: Flunixin meglumine 500mg IM

6. Reversal of anesthesia: 120mg Naltrexone and 30mg atipamazole were administered IM. The animal resumed spontaneous respiration and stood within 5 minutes. When the animal stood, she demonstrated a brief period of forceful abdominal contractions which appeared to resolve within 3-5 minutes.

A: Overall, this animal appears to be healthy despite significant recurrant overgrowth of feet. Lateral hoof wall of lateral claws of hind feet are convex from toed out conformation.

P: Monitor for renarcationization/re-sedation (medetomitine) and schedule immobilization as needed for trimming feet (~6mos). (RBW)

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 2Y 3M 22D	Birth: 26.Sep.2004
Name: Asha		

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16.Jan.2007

were given intramuscularly at 11:30am. A second dose of Atipamazole (30mg) was given at 1:30 pm as it appeared that Asha was sedated and was carrying her head down. After administration of the second dose of reversal, this animal demonstrated forceful abdominal contractions as well as subtle muscle fasciculations that resolved within 15 minutes. At 4:30pm, this animal was bright and alert and was eating hay as well as browse.

6. Ancillary treatment: 2000mls of LRS was administered during the course of anesthesia.

7. *Arterial Sample: pH - 7.5 (From remainder of sample)*

A: Despite the appearance of Asha's feet, her overall body condition is good. Induction, maintenance and reversal of anesthesia were good. Unfortunately, the condition of this animals feet is getting progressively worse and will most likely require more frequent hoof trims to keep this animal comfortable unless a specific etiology can be identified such as nutritional or metabolic that could be treated directly.

P: Re-evaluate serum chemistry, thyroid function as well as trace mineral analysis. Seek consultation on foot films. (RBW)

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI      Sex: Female      Acc. #: 104046  
Baringo giraffe      Age: 2Y 3M 22D      Birth: 26.Sep.2004  
Name: Asha  
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11.Sep.2006

Group Fecal (Stoll's)- 218 Strongyle epG  
Females in Giraffe barn. (RW)

7.Nov.2006

Rx: FENBENDAZOLE 8 gm PO SID for 1 day. \*\* group treatment \*\* (RBW)

.....2007....

16.Jan.2007

Hx: Hoof trim

Proc:

1. Immobilization: A combination of Thiafentanyl (3.5mg), Medetomidine (6mg), and Ketamine (500mg) was administered intramuscularly by non metal dart. The induction was somewhat rough with the animal circling to the right and head extended over back. The animal achieved lateral recumbancy and had achieved medium stage 3 anesthesia within 8 minutes. A 20mm ET tube was placed and oxygen was supplemented with a hudson demand valve. T 99.9-101.7 P 28-30 R 30-50. A total of 370mg ketamine was supplemented during the course of anesthesia in boluses that ranged from 100mg to 170mg. The animal became apneic after last bolus of 170mg ketamine. Oxygen was supplied via IPPV until spontaneous respiration resumed after 10 minutes. Oxygen saturation ranged from 82-98% Blood pressure ranged from 178/85/107 - 182/131/138.

2. Blood collection: A 18ga 2" catheter was placed in the left lateral saphenous vein and 20ml of whole blood was collected for Chemistry, T3/T4(iddex), trace mineral analysis-Cornell and MSU.

3. Radiographs of right hind foot: The radiographs seem to support that the foot problems are most likely due to inherent problems with conformation that cause this animal to walk on the lateral claw and permit severe overgrowth of the medial claw. The lateral aspect of P3 has an irregular margin and the vascular channels appear to be dilated. There also appears to be some loss of joint space within the proximal interphalangeal joint. The lateral aspect of the proximal epiphysis of P1 also appears compressed.

4. Trim feet: The condition of this animals feet is worse than they were when they were evaluated and trimmed 6 months ago. Examination of the solar surface of the right hind medial claw post trimming reveals an area near the apex of P3 where the white line is significantly stretched. There are also focal areas of solar hemorrhage. The soft tissue of the all feet are remarkably hard compared to previous exam. This trim was more difficult and consequently took a greater amount of time.

5. Reversal of anesthesia: Naltrexone(100mg) and Atipamazole(30mg)

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

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GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 2Y 3M 22D	Birth: 26.Sep.2004
Name: Asha		

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18.Jul.2006

Proc:

1. Immobilization: A combination of Thiafentanyl (3mg), Medetomidine (6mg), and Ketamine (460mg) was administered intramuscularly by non metal dart.
2. Transponder placement: Base of L ear: 6891AE9
3. Blood collection: Chemistry(iddex), mineral analysis (Se, Cu, Zn) -Cornell
4. Hair collection for hair mineral analysis
5. Radiographs of feet
6. Trim feet
7. Reversal of anesthesia: Naltrexone(90mg) and Atipamazole(30mg) were given intramuscularly. A second dose of Atipamazole was given at 4:30 pm as it appeared that Asha was still somewhat sedated and "medetomidine recycling" has been anecdotally reported in Giraffe.

A: Despite the appearance of Asha's feet, her overall body condition is good. Induction and maintenace of anesthesia went well however Asha did get up during the procedure even after the administration of supplemental ketamine. Fortunately, she returned to lateral recumbancy without injuring herself or animal management staff. Soft tissue lateral radiographic views revealed some irregularity of the apical margins of the distal phalanxes. It is difficult to ascertain whether these changes are due to chronic inflammation and subsequent remodelling of bone or if there is active inflammation associated with the bone. There appears to be an adequate amount of sole below the apices of the distal phalanxes and there are no draining tracts. A small amount of bruising was noted on the medial claw of the right front foot. The white line appears to be intact. This problem may become chronic/recurrent which will require frequent handling for hoof trims.

P: Critically evaluate all aspects of hoof health including genetic, nutritional(vitamins and minerals), hormonal and environmental. Consult with radiologist from OSU to review foot films. Investigate handling options for regular hoof trimming. (RBW)

21.Jul.2006

Cornell University

Selenium testing- 21.57 ug/dL

Zinc, Serum/Plasma- 1.41 ppm

Copper, Serum/Plasma- 0.05 ppm

According to Cornell's cattle reference ranges all seems to appear normal. (RW)



Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

=====

GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 2Y 3M 22D	Birth: 26.Sep.2004
Name: Asha		

=====

8.Feb.2006  
effects.

Rechecked again at midnight with no effects observed. She was darted with another 6cc of atipamezole. However the dart did not fully discharge and due to her normal appearance another dart was not administered.

Rx: ATIPAMEZOLE HYDROCHLORIDE 30 mg IM  
Rx: ATIPAMEZOLE HYDROCHLORIDE 30 mg IM (TW)

9.Feb.2006

Asha rechecked again this morning. No ill effects observed. The midnight dart and needle from the 3pm darting were removed. Returned to group this afternoon.

Fecal (Stoll's)- 86 Strongyle epg (TW)

24.Mar.2006

Group fecal (Stoll's)- 218 Strongyle epg (RW)

27.Mar.2006

Rx: FENBENDAZOLE 42750 mg PO once for 1 dose. \*\* group treatment \*\*  
(TW)

29.Mar.2006

0.7 giraffe ate 75% of the prescribed fenbendazole over the course of the day 3/28/06 and a total of 100% of the prescribed fenbendazole by morning. (RW)

30.Mar.2006

Asha is exhibiting a mild lameness of the right front leg as reported by AMS. She was observed today, and although a lameness is difficult to pick up, her gait does appear a bit off. Plan to monitor over the next few days. (TW)

6.Apr.2006

Fecal (Stoll's)- 372 Strongyle epg (RW)

18.Jul.2006

Hx: Asha has demonstrated rapid and irregular hoof wall growth that predominately affects both hind limbs and the right forelimb. Despite aggressive trimming under anesthesia less than 6 months ago, the hoof capsule has become overgrown and appears to affect her comfort as well as her ability to ambulate. At this time, it does not seem that Asha is able to maintain normal hoof conformation with environmental wear.

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

=====  
GIRAFFA CAMELOPARDALIS ROTHSCILDI      Sex: Female      Acc. #: 104046  
Baringo giraffe      Age: 2Y 3M 22D      Birth: 26.Sep.2004  
Name: Asha  
=====

.....2005...

8.Jun.2005

Rx: FENBENDAZOLE 33600 mg PO once for 1 dose for 1.5 giraffe. \*\* group treatment \*\*

Asha was not observed to consume much of the medicated grain. Plan to recheck fecal egg counts in 1 week. (TW)

20.Jun.2005

Fecal Flo (Stoll's): neg (TW)

7.Sep.2005

fecal flo: 210 strongyle epg (TW)

14.Sep.2005

Rx: FENBENDAZOLE 22800 mg PO once for 1 dose. \*\* group treatment \*\*  
(TW)

1.Nov.2005

Asha observed for hoof overgrowth today. Both rear feet have significant overgrowth of the hoofwalls, causing moderate seperation of the inderdigital space. Unknown cause for this overgrowth (lack of wear, genetic, nutritional?). Now that she is indoors and on cement, she should be monitored over the next month for wwearing of this overgrowth, but if there is no improvement, consider immobilization for hoof trim. (TW)

.....2006...

8.Feb.2006

Asha was immobilized for a hoof trim (rear hooves extremely overgrown). She was immobilized with A3080/Medetomidine/ketamine, and anesthesia, induction and recovery were smooth and uneventful. Blood was collected for fibrinogen and serum storage. Fecal was collected for quantitative fecal float. Physical exam was within normal limits.

Rx: IVERMECTIN 75 mg SQ once for 1 dose.

Rx: TETANUS TOXOID 2 ml IM once for 1 dose.

Addendum: Reversal with atipamizole was planned for repeat at the end of the day due to anecdotal reports of medetomidine recycling in giraffe. However, Asha was showing signs of medetomidine effects by 2pm in the afternoon and was redosed with atipamizole at 3:30. Reversal of effects at this time was complete.

At 8pm Asha was rechecked and showing no signs of Medetomidine

Clinical Notes - Individual Specimen Report  
I.C.P.W.A.

=====

GIRAFFA CAMELOPARDALIS ROTHSCILDI	Sex: Female	Acc. #: 104046
Baringo giraffe	Age: 7M 30D	Birth: 26.Sep.2004
Name: Asha		

=====

....2004....

26.Sep.2004

Morgan calved at 3:45p.m. The calf was standing at about 4:30p.m. and nursing normally within 1-2 hours. (VS)

....2005....

12.Apr.2005

Rx: FENBENDAZOLE 25000 mg PO once for 0.5 giraffe. Dosage is 8 mg/kg.  
\*\* group treatment \*\* (TW)

24.May.2005

Fecal Flo (stoll's): 60 strongyle epg, 10 strongyloides epg

Fecal egg counts are high in all giraffe now that they are out on and grazing pasture. Plan to deworm all giraffe and follow up with recheck individual fecals. (TW)

25.May.2005

Rx: FENBENDAZOLE 24000 mg PO once for 1 dose for 1.4 animals. \*\* group treatment \*\* (TW)

27.May.2005

All giraffe ate 75% of the prescribed fenbendazole over the course of the day. Plan to repeat this treatment in 2 weeks and recheck fecal egg counts one week after that. (TW)

**EMAIL FROM  
DIRECTOR OF ANIMAL MANAGEMENT  
THE WILDS  
TO  
TULSA ZOO LARGE MAMMAL CURATOR  
DATED 10/16/2009**

---

>>> "Beetem, Dan" <[REDACTED]> 10/16/2009 1:20 PM >>>

Hi Karen-

Karl arrived about noon today, and Asha loaded without any trouble.

He

is

back on the road to Tulsa. Please give us a call know after you get her unloaded.

My office number is 740-638-5030 ext 2110

My cell number is 740-255-1278

Thanks-

Dan

**TULSA ZOO GIRAFFE INCIDENT REPORT  
DATED 11/19/2009**

## Tulsa Zoo Giraffe Incident Report

Prepared by

Kay Backues, DVM

Terrie Correll, Zoo Director

November 19, 2009

The Tulsa Zoo has had a single male giraffe since August 23, 2008. As part of the Giraffe PMP, a female giraffe, "Asha" (studbook #2979), from The Wilds, Ohio was selected to be paired with the Tulsa male for breeding.

Transport arrangements were coordinated with The Wilds, the sending institution. The Tulsa Zoo contracted Larry Johnson of Safari Enterprises to transport the giraffe. Mr. Johnson and his staff have 45 years of combined experience in transporting large animals such as giraffe. He used a specially designed trailer with an elevated roof for the transport. Mr. Johnson estimates he and his staff have transported around 400 giraffe without incidence.

The giraffe was loaded for shipment at The Wilds and trailered to Tulsa, a 48-hour trip. As per USDA guidelines, stops were made a minimum of every 4 hours to check on the well being of the animal. Food and water were available to the animal throughout the transport. Additionally, it is the policy of Mr. Johnson's company, to check on the animal every time the driver stops. No injury was evident during the transport inspections.

The 5-year-old female giraffe arrived at the Tulsa Zoo October 18<sup>th</sup> at approximately 8:30 am. When first visualized, the giraffe was standing alert, but she had an obvious crick or misalignment in the middle of her neck. The animal was nervous and circling in the trailer's front compartment, but she had adequate space to turn around. The transport driver reported no incident he was aware of during the transport that would have caused the injury.

Before the giraffe was off-loaded from the trailer, she was injected with vitamin E and lightly sedated with azaperone, IM, by Dr. Backues, staff veterinarian. The giraffe was initially reluctant to exit the trailer and walk into the barn, but she eventually did so without incident. The giraffe remained calm throughout the day, ate well and ambulated normally.

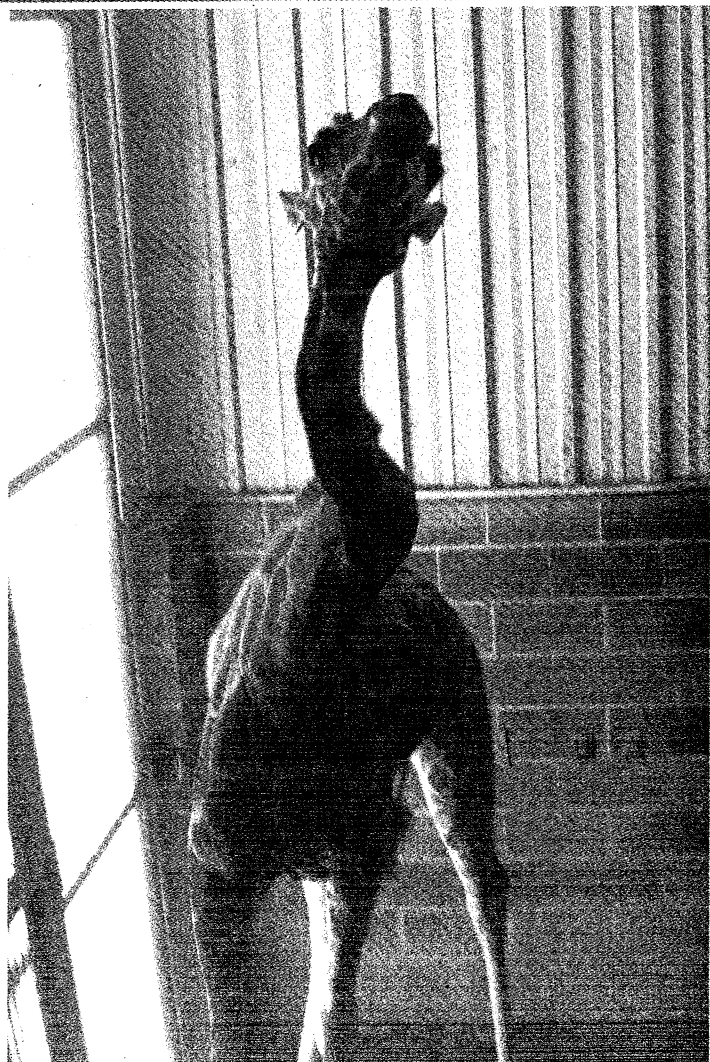
The animal was started on daily oral muscle relaxers, NSAIDs, and vitamin E. Based on Dr. Backues' consultations with other exotic animal veterinarians, we first needed to determine if a possible soft tissue trauma had occurred, such as a focal myositis, or ligament or tendon injury. After 10 days, the muscle relaxer dose was lowered and the analgesic tramadol added to her regimen. She has continued to eat and ambulate normally. She initially appeared to be comfortable and could reach her head down. She has been seen lying down in a sternal position and then returning to a standing condition.

In the last week, her behavior while standing would indicate some degree of discomfort, and the misalignment angle of her neck appears to be fibrosing at a more acute angle. The anatomy of the neck and the strong nuchal ligament in this species are working against normal alignment of the cervical vertebrae and appear to be aggravating the initial misalignment.

Currently, we are working to train "Asha" to enter the restraint chute in preparation for a standing sedation in order to x-ray the injured section of the neck. We have an equine surgeon from OSU who will be on site next week for a consultation in preparation for the x-ray. Based on the results of the x-ray, the following course of action may include a full anesthetic episode where the animal is laid laterally to better manipulate her neck.

However, there still may be no definitive, physical treatment for her injury. Her current condition is stable, but her long-term prognosis is still unknown. We will need to take her treatment one day at a time.





**USDA COMPLAINT INFORMATION**

November 20, 2009

USDA/APHIS/AC  
Western Region  
2150 Centre Ave.  
Building B, Mailstop 3W11  
Fort Collins, CO 80526-8117



To Whom It May Concern:

I have enclosed a report regarding the recent transfer of a female giraffe from The Wilds, Cumberland Ohio to the Tulsa Zoo, Tulsa, Oklahoma. During the transport the animal sustained a neck injury. I have attached an incident report along with photos for your review. I have also attached photographs of the injury.

If you have any questions do not hesitate to contact me at:  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org) or 918-669-6223 or Dr. Kay Backues, Tulsa Zoo staff veterinarian at [kbackues@cityoftulsa.org](mailto:kbackues@cityoftulsa.org) or 918-669-6243.

Sincerely,

A handwritten signature in black ink that reads "Terrie Correll". The signature is written in a cursive, flowing style.

Terrie Correll  
Zoo Director

Cc: Dr. Kay Backues, Tulsa Zoo  
Dr. Evan Blumer, The Wilds  
Dr. Barbara Wolfe, The Wilds

November 21, 2009

USDA/APHIS/AC  
Western Region  
2150 Center Ave  
Building B, Mailstop 3W11  
Fort Collins, CO 80526-8117



To Whom It May Concern:

This is a follow-up letter to clarify in the Tulsa Zoo Giraffe Incident Report submitted November 20, 2009 that the giraffe was loaded without incident at The Wilds for transport to Tulsa. This was not clearly stated in the report. If you have any questions do not hesitate to contact me at: [tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org) or 918-669-6223 or Dr. Kay Backues, Tulsa Zoo staff veterinarian at [kbackues@cityoftulsa.org](mailto:kbackues@cityoftulsa.org) or 918-669-6243.

Sincerely,

A handwritten signature in cursive script that reads "Terrie Correll".

Terrie Correll  
Zoo Director

Cc: Dr. Kay Backues, Tulsa Zoo  
Dr. Evan Blumer, The Wilds  
Dr. Barbara Wolfe, The Wilds

December 18, 2009

Dr. Robert Gibbons  
USDA/APHIS/AC  
Western Region  
2150 Centre Ave.  
Building B, Mailstop 3W11  
Fort Collins, CO 80526-8117



To Whom It May Concern:

I am formally lodging a complaint on the Larry Johnson, Safari Enterprises, (#31-C-052) of the giraffe transport from The Wilds (#73-C-0129) regarding the giraffe that sustained a neck injury in transport from The Wilds (#31-C-052) Cumberland, OH to the Tulsa Zoo, OK on October 18<sup>th</sup>. We had previously submitted an incident report to your office and had received a focused inspection on November 25<sup>th</sup> of the incident by Jan Feldman, Animal Care Specialist and Dr. Michael Tygart, Veterinary Medical Officer. An incident report was submitted to your office by the Tulsa Zoo on November 20<sup>th</sup>. Additionally, under the Freedom of Information Act, I also request a copy of the report regarding this complaint and the final report of the focused inspection of the The Wilds, transporter Larry Johnson, Safari Enterprises (31-C-052).

If you have any questions do not hesitate to contact me at:  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org) or 918-669-6223.

Sincerely,

A handwritten signature in black ink that reads "Terrie Correll". The signature is written in a cursive, flowing style.

Terrie Correll  
Zoo Director

Cc: Gerald Bender, City of Tulsa Legal Dept.

## **Terrie Correll**

---

**From:** Terrie Correll  
**Sent:** Friday, December 18, 2009 1:10 PM  
**To:** Dolman, Lucy; Neal, Susan; Bender, Gerald; Felix-Warwick, Erica; Criswell, Cathy; Doerflinger, Preston; Ackley, Cecilia; Maxwell, Ron  
**Subject:** Status of USDA Report

Dear All,

I have spoken with Dr. David Sabalia , Supervisory Animal Care Specialist, Western Region, Fort Collins (1-970-494-7463) regarding the status of the focused inspection report. He was sympathetic and understood our need for their findings but he emphasized it is a lengthy process.

He reviewed with me their process:

- 1) They received our incident report regarding the giraffe transport.
- 2) They have to review/investigate any animal death or injury or injury by an animal to the public.
- 3) They are gathering the facts/information regarding the giraffe transport.
- 4) They will have to determine the "who, what, when" it happened.
- 5) After the information is gathered and reviewed, they will make a determination. He also reiterated to me that the determination may show that there was no violation of the Animal Welfare Act (Section 3.137-3.142) in transporting the giraffe.
- 7) We will have to request the results through the Freedom of Information Act (Riverdale MD office).
- 8) He could not give me a time frame on when they would have a final determination on their findings.

Also, after speaking with this office yesterday and with Dr. Sabalia today, I filed a formal letter of complaint with the USDA office in Ft. Collins (electronically and by mail). As a result of this, they will issue a complaint number to us. After 30-60 days we can request a response through the Freedom of Information Act regarding our complaint. They did say that occasionally it may take longer than this time frame.

I filed the complaint letter so that we would have two opportunities to request the information regarding the incident .

I have spoken with Gerry regarding this and have cc'd a copy of the letter to him.

Terrie

Terrie Correll  
Zoo Director  
Tulsa Zoo and Living Museum  
5701 E. 36th Street North  
Tulsa, OK 74115

Phone: 1-918-669-6223  
Cell: 1-918-527-0154  
Fax: 1-918-669-6260  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org)

## Terrie Correll

---

**From:** Katie.M.Green@aphis.usda.gov  
**Sent:** Monday, December 21, 2009 1:59 PM  
**To:** Terrie Correll  
**Subject:** Re: Tulsa Zoo Complaint  
**Attachments:** USDA\_Complaint\_Tulsa.jpg

December 21, 2009

Terrie Correll  
Tulsa Zoo  
5701 E. 36<sup>th</sup> Street North  
Tulsa, OK 74115  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org)

Dear Complainant:

Thank you for your emailed letter dated December 18, 2009 concerning Larry Johnson. Your concern has been issued number W10-044. 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](mailto: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,

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

Rec'd 1/16/10



United States  
Department of  
Agriculture

January 8, 2010

Marketing and  
Regulatory  
Programs

Terri Correll  
Zoo Director  
Tula Zoo and Living Museum  
5701 E. 36<sup>th</sup> Street North  
Tulsa, OK 74115

Re: FOIA 10-186

Animal and  
Plant Health  
Inspection  
Service

Legislative and  
Public Affairs

Freedom of  
Information

Dear Terri Correll:

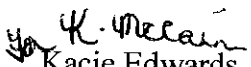
4700 River Road  
Unit 50  
Riverdale, MD  
20737-1232

This is to acknowledge receipt of your letter dated January 7, 2010 in which we received in this office January 7, 2010. Which you requested the results of a focused inspection conducted at the Tulsa Zoo (73-C-0129) on November 25, 2009, by Dr. Michael Tygart, DVM and Jan Feldman, Animal Care Specialist, regarding the injury of a giraffe that was transported to the zoo.

The records you seek are maintained outside of this office and we have not yet been able to complete a search to determine whether there are records within the scope of your request. Additionally, all Freedom of Information Act (FOIA) requests are processed on a "first-in, first-out" basis, according to track. Due to the large number of FOIA requests our Agency has been receiving, we have a considerable backlog, and unfortunately a number of requests still remain in the queue. Accordingly, we will be unable to comply with the twenty-working-day time limit in this case, as well as the ten additional days provided by the statute. Please be advised; however, responding to all FOIA requests as promptly as possible is a high priority for our Agency.

I regret the necessity of this delay, but I assure you that your request will be processed as soon as possible. If you have any questions or wish to discuss reformulation or an alternative time frame for the processing of your request, you may contact me at (301) 734-5385.

Sincerely,

  
Kacie Edwards  
FOIA Specialist





Tulsa Zoo & Living Museum  
5701 E. 36th St. North  
Tulsa, OK 74115-2121  
Phone: (918) 669-6600  
Fax: (918) 669-6260

# Fax

<b>To:</b>	FOIA OFFICER	<b>From:</b>	Terrie Correll
<b>Fax:</b>	1-301-734-5941	<b>Date:</b>	January 7, 2010
<b>Phone:</b>		<b>Pages:</b>	4
<b>Re:</b>	FOIA Request	<b>CC:</b>	

## Comments:

I am requesting under the Freedom of Information Act the results of a focused inspection conducted at the Tulsa Zoo (license 73-C-0129) on November 25, 2009 by Dr. Michael Tygart, DVM and Jan Feldman, Animal Care Specialist, regarding the neck injury of a giraffe that was transported to our zoo. The giraffe was transported from The Wilds (license 31-C-052) by Larry Johnson, Safari Enterprises, (license 74-B-0337). I am also requesting the results of the focused inspection of The Wilds (license 31-C-052) and Larry Johnson, Safari Enterprises (license 74-B-0337). I have attached the initial incident report from the Tulsa Zoo submitted to the Fort Collins office on November 20, 2009.

## **Terrie Correll**

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**From:** Terrie Correll  
**Sent:** Thursday, January 07, 2010 10:41 AM  
**To:** 'foia.officer@aphis.usda.gov'  
**Subject:** Request for Status of Tulsa Zoo Focused Inspection Reports  
**Attachments:** Tulsa Zoo Giraffe Incident Report.pdf; Cover Letter USDA Giraffe Report.doc

To Whom It May Concern:

I am requesting under the Freedom of Information Act the results of a focused inspection conducted at the Tulsa Zoo (license 73-C-0129) on November 25, 2009 by Dr. Michael Tygart, DVM and Jan Feldman, Animal Care Specialist, regarding the neck injury of a giraffe that was transported to our zoo. The giraffe was transported from The Wilds (license 31-C-052) by Larry Johnson, Safari Enterprises, (license 74-B-0337). I am also requesting the results of the focused inspection of The Wilds (license 31-C-052) and Larry Johnson, Safari Enterprises (license 74-B-0337). I have attached the initial incident report from the Tulsa Zoo submitted to the Fort Collins office on November 20, 2009.

I am requesting acknowledgment of receipt and reading of this email.

Thank you for your assistance.

Terrie Correll  
Zoo Director  
Tulsa Zoo and Living Museum  
5701 E. 36th Street North  
Tulsa, OK 74115

Phone: 1-918-669-6223  
Cell: 1-918-527-0154  
Fax: 1-918-669-6260  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org)



Rec'd 1/25/10

United States  
Department of  
Agriculture

January 19, 2010

Marketing and  
Regulatory  
Programs

Terrie Correll  
Zoo Director  
Tulsa Zoo and Living Museum  
5701 E. 36<sup>th</sup> Street North  
Tulsa, OK 74115

Re: FOIA 10-201

Animal and  
Plant Health  
Inspection  
Service

Legislative and  
Public Affairs

Dear Terrie Correll:

Freedom of  
Information


4700 River Road  
Unit 50  
Riverdale, MD  
20737-1232

This is to acknowledge receipt of your letter dated January 19, 2010, which was received in this office on January 19, 2010. Which you requested the results of the findings for complaint W10-044 filed by the Tulsa Zoo (73-C-0129) the complaint was filed on December 18, 2009, to the Western Region.

The records you seek are maintained outside of this office and we have not yet been able to complete a search to determine whether there are records within the scope of your request. Additionally, all Freedom of Information Act (FOIA) requests are processed on a "first-in, first-out" basis, according to track. Due to the large number of FOIA requests our Agency has been receiving, we have a considerable backlog, and unfortunately a number of requests still remain in the queue. Accordingly, we will be unable to comply with the twenty-working-day time limit in this case, as well as the ten additional days provided by the statute. Please be advised; however, responding to all FOIA requests as promptly as possible is a high priority for our Agency.

I regret the necessity of this delay, but I assure you that your request will be processed as soon as possible. If you have any questions or wish to discuss reformulation or an alternative time frame for the processing of your request, you may contact me at (301) 734-5360.

Sincerely,

  
Sophie Lau-Lopez  
FOIA Specialist



Tulsa Zoo & Living Museum  
5701 E. 36th St. North  
Tulsa, OK 74115-2121  
Phone: (918) 669-6600  
Fax: (918) 669-6260

# Fax

<b>To:</b>	FOIA Officer	<b>From:</b>	Terrie Correll, Zoo Director
<b>Fax:</b>	1-301-734-5941	<b>Date:</b>	January 19, 2010
<b>Phone:</b>		<b>Pages:</b>	1
<b>Re:</b>	FOIA Request for W10-044	<b>CC:</b>	

Dear FOIA Officer,

I am requesting under the Freedom of Information Act the results of your findings for complaint W10-044 filed by the Tulsa Zoo (73-C-0129). The complaint was filed on December 18, 2009 to the Western Regional Office, Fort Collins.

I am requesting acknowledgement of receipt of this fax.

Thank you for your assistance.

Terrie Correll  
Zoo Director  
Tulsa Zoo and Living Museum  
5701 E. 36th Street North  
Tulsa, OK 74115

Phone: 1-918-669-6223  
Fax: 1-918-669-6260  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org)

---

## Terrie Correll

---

**From:** Terrie Correll  
**Sent:** Tuesday, January 19, 2010 9:12 AM  
**To:** 'foia.officer@aphis.usda.gov'  
**Subject:** Complaint W10-044 Request for Findings

Dear FOIA Officer,

I am requesting under the Freedom of Information Act the results of your findings for complaint W10-044 filed by the Tulsa Zoo (73-C-0129). The complaint was filed on December 18, 2009 to the Western Regional Office, Fort Collins.

I am requesting acknowledgement of receipt and reading of this email.

Thank you for your assistance.

Terrie Correll  
Zoo Director  
Tulsa Zoo and Living Museum  
5701 E. 36th Street North  
Tulsa, OK 74115

Phone: 1-918-669-6223  
Cell: 1-918-527-0154  
Fax: 1-918-669-6260  
[tcorrell@cityoftulsa.org](mailto:tcorrell@cityoftulsa.org)

**EXHIBIT 5**

**USDA RECORD OF DISPOSITION  
DATED 10/16/2009  
AND  
OTHER DELIVERY AND ACCEPTANCE  
DOCUMENTATION**

U.S. DEPARTMENT OF AGRICULTURE  
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

RECORD OF DISPOSITION

Date of Disposition:

10/16/09

PAGE 1 of 1

SALE     EXCHANGE OR TRANSFER     DONATION

SELLER OR DONOR

THE WILDS  
14000 INTERNATIONAL RD.  
CUMBERLAND, OH

BUYER OR RECIPIENT

TULSA ZOOLOGICAL PARK  
5701 E 36th ST NORTH  
TULSA, OK 74115

DEALER'S LICENSE NUMBER:

31-C-052

RECIPIENT'S LICENSE NUMBER:

73-C-0129

IDENTIFICATION OF EACH ANIMAL BEING DELIVERED

ACC#/SB#	SEX M/F	DATE OF BIRTH	COMMON NAME
104046	F	9/26/2004	Giraffe

DELIVERY BY  COMMERCIAL VEHICLE     BUYER'S VEHICLE     SELLER'S VEHICLE

Name & Address of Company or Firm:  
SAFARI ENTERPRISES  
PO BOX 2012  
BOERNE, TX 78006

Name & Address of Truck Driver:

Total no. Received	No. Dead	No. Alive	Comments
1	0	1	Arrived in Good Shape
Received By	Signature	Title	Date:
Tulsa Zoo KAREN DUNN	Karen Dunn	Zo. Mammal Curator	Oct 18, 2009

10-18-2009

# AMERICAN ASSOCIATION OF ZOO VETERINARIANS STANDARD CERTIFICATE OF VETERINARY INSPECTION

OWNER *the Wilds* CONSIGNEE *Tulsa Zoo & Living Museum* DATE ISSUED *10/15/09*  
 ADDRESS *4400 International Rd* ADDRESS *6421 E. 36th St North* Mode of Transport  Land  Air  Sea  
*Cumberland OH 43732* *Tulsa, OK 74115* NAME OF AGENT  
 PHONE *(740) 638-5030* PHONE *(918) 669-6660*

ANIMAL I.D. Tattoo Band Tag Etc.	NAME Common Scientific	PHYSICAL DESCRIPTION Age Sex Weight Other	HISTORY Date of Vaccination including name of product used Date of last deworming including name of product used Housed with ..... other animals Recent Health problems with similar or adjacent species Given name and dosage of all drugs given prior to or during transport (including antibiotics, restraint or immobilizing drugs) Tuberculin Used and Dosage <input type="checkbox"/> Mammalian old tuberculin <input type="checkbox"/> Bovine PPD results: <input type="checkbox"/> Pos <input type="checkbox"/> Neg <input type="checkbox"/> Suspicious Other (specify) <input type="checkbox"/> Positive <input type="checkbox"/> Negative EIA results for Equine <input type="checkbox"/> Positive <input type="checkbox"/> Negative Brucellosis Test for Ruminants								
<i>O.1 Candopondals 104046</i>	<i>Giraffe "Ashia"</i>	<i>Retire/Roth</i>	Site of injection ..... Test Dilution <table border="1"> <tr> <td>1-50</td> <td>1-100</td> <td>1-200</td> <td>Results</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </table> Method of Examination <input checked="" type="checkbox"/> Visual <input type="checkbox"/> Physical <i>John's fecal PCR (unlisc) (report pending)</i>	1-50	1-100	1-200	Results				
1-50	1-100	1-200	Results								

Permit Obtained If Required Yes  No   
 White Copy - State Veterinarian Office  
 Green Copy - State Veterinarian Office  
 Yellow Copy - Issuing Veterinarian  
 Pink Copy - Accompany Shipment  
 Orange Copy - Owner

SIGNATURE *Bryan A. Muecke* ADDRESS *4400 International Rd Cumberland OH 43732* DVM  
 APPROVED BY \_\_\_\_\_ State Veterinarian AAZV Member  Non Member

"I certify, as an accredited veterinarian, that the above described animals have been inspected by me and that they are not showing signs of infectious, contagious, and/or communicable disease. (except where noted). The vaccinations and results of tests are as indicated on the certificate. To the best of my knowledge, the animals listed on this certificate meet the state of destination and federal interstate requirements. No further warranty is made or implied."





# ANIMAL DATA TRANSFER FORM

- 1. Curator's copy of information on new arrival
- 2. Keeper's copy of information on new arrival      Date: \_\_\_\_\_
- 3. Copy for zoo files and/or veterinarian

\*\*\*Please send a copy of this form to shipping institution and state condition of animal(s)\*\*\*

Shipping Institution (s) \_\_\_\_\_  
 Receiving Institution The Wilds  
 Contact Person Patty Glaze  
Animal Management Specialist/ Registrar  
 Email pglaze@thewilds.org  
 Shipping Institution \_\_\_\_\_

Phone/Fax 740-638-5030 ext 2072

Common name:		Scientific name:					
ID#	House Name	Sex	Hatch/Birth Date*	Tattoo Band/Tag#	Weight*	Transponder	Studbook # (Regional/International)
046	Asha	female	09/26/2004				2979

\*if it is actual or estimated

Current diet and supplements, favored items, problem foods, feeding procedures.  
 Feeds once a day of Mazuri Wild Herbivore diet Hi-Fiber

Choice alfalfa hay

Feed when available: favorite browse: black locust willow.

*This is considered a toxic plant.*

**BEHAVIORAL HISTORY & SPECIFICATIONS:** Please list any unique behavioral traits, problems with aggression, safety concerns, or other special problems that may affect management.

Disposition (skittish, prefers males over females, imprinted, aggressive, etc.):  
 Not shown aggression towards keepers. She tends to be very stubborn when she is exposed to new situations. She does not like to be handled by keepers but will come up for browse. She will move from stall to stall and respect keeper space.

Stereotypic behavior (frequency, severity, duration, triggers)  
 Reared head back when isolated for procedures or end of winter boredom.

Methods used for managing stereotypic behavior:  
 Offer blues we offer browse in branch (leaveless) form and the giraffe will strip the bark and chew on the branches. The more browse the less head flipping observed.

Does animal have a history of aggression towards keepers and/or other animals?  no       yes  
 If yes, please explain:

Describe the conditions and behavioral precursors to the aggression?

Successful strategies are used for dealing with the aggression?

Other comments or describe other behaviors that require further explanation:

**CLINICAL HISTORY OR PHYSICAL CONDITION:** Medication techniques, immobilization techniques, chronic medical problems, Vet Contact, clinical records concerning past procedures.

**EXHIBIT 6**

**MEMO DATED 12/16/2009  
FROM  
LARGE MAMMAL CURATOR  
TO  
ZOO DIRECTOR**

Date: 16 December 2009



To: Terrie Correll, Director, Tulsa Zoo

Re: Comment, USDA Disposition form:  
Giraffe #15976, Amali

**TULSAZOO**  
LIVING MUSEUM

In response to your question as to why I commented on the USDA Record of Disposition form that, the "animal arrived in good shape":

The driver mentioned that the giraffe seemed to have not settled down for most of the trip. We all wanted to get her unloaded, into the barn, and move the transport truck out of the area as soon as possible to provide a quiet atmosphere in and around the barn. Since we had to bring the transporters truck through the zoo to get to the giraffe barn, we also wanted to move the truck out of the area and out of the zoo before visitors were on the walkways. When I signed the documents our staff veterinarian, Dr. Kay Backues was inside the giraffe barn and I was near the truck.

At the time I signed the documents I was aware that Amali had a slight bulge in her neck; but at that time, it was speculated that it might be a tightened muscle. Her overall condition was good otherwise; in that she showed no signs of discomfort, stress, or any mobility problems. After a short period of time (approximately 10 minutes) Amali exited the trailer & walked without incident into the barn. She immediately went to the fence that divided her and another new female & they sniffed each other. Within a minute of entering the barn; Amali was eating, drinking, and casually checking out her new surroundings. She even came over and sniffed my hand at the elevated keeper walk way area. These are all good signs that an animal is comfortable & un-stressed. I based my comment more on her actions than her medical condition.

I take full responsibility for my error regarding the comment. It was obvious that she was not in excellent shape when she arrived; instead of "good", I should have commented that this animal was in "fair" or "poor" condition. My judgment was poor in this particular circumstance and while it is common practice for Animal Curators to sign these documents when an animal arrives; I should have deferred the document to Dr. Backues to sign & comment medically regarding the animals condition.

Sincerely,

*Karen Dunn*

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Karen Dunn, Large Mammal Curator  
Tulsa Zoo & Living Museum  
5701 E. 36th St. North  
Tulsa, OK 74115

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**PHOTOGRAPH SUMMARY**

## PHOTOGRAPH SUMMARY

A total of 237 photographs have been obtained by Internal Auditing as follows:

- 149 photographs related to Amali's arrival on 10/18/2009
  - 43 photographs of Amali's first week at the Tulsa Zoo
  - 38 photographs related to Amali's veterinary procedures
  - 7 photographs of Amali's X-rays

The 149 photographs related to Amali's arrival on 10/18/2009 pertain to the scope of this review. Some of the 149 photographs are either unclear, blurry, dark or have images that are not directly relevant to documentation of Amali's neck misalignment (i.e. bull giraffe, Santa Barbara female giraffe, do not show Amali, etc.). Many of the photographs may be subject to individual viewer interpretations. It is Internal Auditing's observation that no photograph has been obtained that clearly shows the neck misalignment while Amali is still present in the transporter trailer. Following is a summary of the photographs considered by Internal Auditing to be of most interest for this review based on our judgment. Other viewers may have different opinions and all photographs can be made available if needed.

### PHOTOGRAPH FILE NAME

### DESCRIPTION

SANY 1539  
SANY 1540

Amali coming off trailer with misalignment possibly visible.

Series from:  
SANY 1542  
To  
SANY 1545

Shows use of aluminum poles for guiding Amali into barn during the unloading process. Interview statements indicated such circumstances are normal for handling hoof stock and did not relate to the neck injury. Also, this series occurs after the first observation of the neck misalignment as per Series of PICT 0007 to PICT 0025 described below and possibly visible misalignment shown in SANY 1539 and SANY 1540.

PICT 0018

Amali inside trailer with abraded ossicones visible

Series from:  
PICT 0007  
To  
PICT 0025

Shows sequence of truck/trailer entering ZOO grounds with stop at PICT 0019 showing ZOO Veterinarian first observation of neck misalignment as stated during interview. The sequence continues showing truck/trailer backing to giraffe barn for unload.

PICT 0031	Misalignment possibly visible.
PICT 0042	Misalignment possibly visible.
PICT 0043	Misalignment possibly visible.
Series from: PICT 0051 To PICT 0063	Shows use of aluminum poles for guiding Amali into barn during the unloading process. Interview statements indicated such circumstances are normal for handling hoof stock and did not relate to the neck injury. Also, this series occurs after the first observation of the neck misalignment as per Series of PICT 0007 to PICT 0025 described above and possibly visible misalignment shown in SANY 1539 and SANY 1540.
PICT 0066	Misalignment possibly visible.
PICT 0069	Misalignment possibly visible.
PICT 0070	Misalignment possibly visible.
PICT 0077	Misalignment possibly visible.
PICT 0078	Misalignment possibly visible.
PICT 0080	Misalignment possibly visible.
PICT 0081	Misalignment possibly visible.
PICT 0083	Misalignment possibly visible.
PICT 0084	Abraded ossicones.
PICT 0085	Abraded ossicones (blurry).
PICT 0086	Abraded ossicones.
PICT 0087	Abraded ossicones.
PICT 0089	Abraded ossicones.
PICT 0093	Abraded ossicones.
PICT 0095	Abraded ossicones.
PICT 0096	Abraded ossicones.
PICT 0097	Abraded ossicones and abrasion over eye.
PICT 0099	Abrasion over eye.
PICT 0100	Abrasion over eye.
PICT 0101	Abrasion over eye (blurry).
PICT 0102	Abrasion over eye (blurry).
PICT 0104	Abraded ossicones.
PICT 0105	Abraded ossicones (blurry).
PICT 0106	Abraded ossicones (blurry).
PICT 0109	Misalignment possibly visible.

PICT 0111	Abrasions on rump and bloody injection site.
PICT 0112	Abraded ossicones.
PICT 0113	Abraded ossicones (blurry).
PICT 0114	Abraded ossicones (blurry).
PICT 0115	Abraded ossicones, misalignment possibly visible.
PICT 0116	Abraded ossicones, misalignment possibly visible.
PICT 0117	Abraded ossicones.
PICT 0120	Abraded ossicones.
PICT 0125	Abrasion over eye, eating.
PICT 0132	Misalignment possibly visible.
PICT 0133	Misalignment possibly visible.
PICT 0134	Abraded ossicones.