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March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

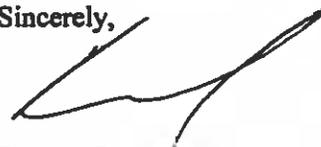
Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bundu Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: _____

Name: Julian A. Sullivan

Date: 02/06/2018



Department of the Interior
U.S. Fish and Wildlife Service

MAR 15 2018

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ~~ESA~~)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Sullivan	1.b. First name Julian	1.c. Middle name or initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. [REDACTED]	4. Occupation [REDACTED]	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address [REDACTED]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution N/A		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Madison	1.c. State Alabama	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Bontebok MA24105C-0 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <div style="display: flex; justify-content: space-between;"> <div>Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)</div> <div>Date of signature (mm/dd/yyyy) 30 Feb 2018</div> </div>	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe, Dande South
 - b. Date wildlife is to be hunted:
12 - 24 September 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
skin, skull, teeth, claws -- all parts for life-sized mount
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Name: Anthony Crick
Business Name:	Business Name: HHK Safaris (Pvt) Ltd
Address:	Address: 4 Wayhill Lane West,
Address:	Address: Umwinsidale,
City:	City: Harare
State/Province:	State/Province: Mashonaland Central
Country, Postal Code:	Country, Postal Code: 0000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators. CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

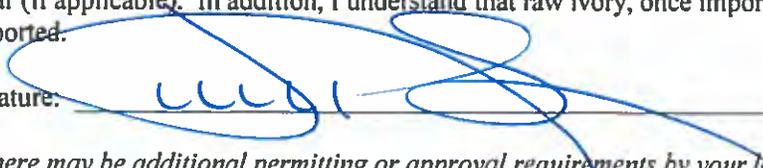
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 20 Feb 2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE

Mr. Brar is also the owner Nimali Africa Safari, a photographic company with camps in the Tarangire National Park. However, he maintains that hunting is the best form of conserving wildlife and habitat.

In 2015, each hunting company must submit a three-year report to the Ministry of Natural Resources and Tourism. The basis of the reports are payment of government fees, conducting hunting safaris in a legal and ethical manner, company anti-poaching expenses and results, and community development. In December of 2015, each company received a letter from the Ministry applauding their excellence and commitment to conservation. The companies are pre-qualified for renewal of their currently allocated areas by continuing their current efforts.

DESCRIPTION OF HUNTING AREAS

RUNGWA GAME SAFARIS

Rungwa Mpera Game Reserve & Kizigo West Game Reserve

Rungwa Mpera Game Reserve and Kizigo West Game Reserve share a border as well as with the Ruaha National Park. This allows the anti-poaching units to effectively monitor both areas. Rungwa Mpera Game Reserve spans 2,068 square kilometers and Kizigo West Game Reserve is 1,288 square kilometers. These areas have an established road network. The areas act as a dry season refuge for the Ruaha National Park due to natural springs and pools. Lion are abundant in these areas because of the large prey base protected by the anti-poaching teams. Wildlife frequently viewed in the areas are buffalo, kudu, sable, roan, eland, zebra and hartebeest. The company acquired Kizigo West Game Reserve at the beginning of 2014.

Selous Game Reserve K1

The Selous Game Reserve is the largest game reserve dedicated to hunting and photographic tourism. The vast majority of the Reserve has been set aside for hunting. Selous K1 Game Reserve is located in the far western part of the Reserve covering 332 square kilometers. The area boasts a strong lion population. The Selous Game Reserve is home to the largest population of buffalo in Africa and the company's anti-poaching campaigns help maintain strong buffalo numbers in the area. Furthermore, healthy herds of elephant, sable, hippo, wildebeest, zebra, waterbuck, impala, hippo, and crocodile are present. The company obtained Selous Game Reserve K1 in early 2014.

Tanzania Bundu Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$138,000	\$138,000	\$138,000
License Fees	\$117,300	115,354	\$55,300
Trophy Fees	\$294,600	\$323,760	\$185,490
TALA License	\$2,400	\$3,000	\$2,200
PH License Fees	\$8,000	\$9,000	\$7,000
YEARLY TOTAL	\$560,300	\$589,114	\$387,990
GRAND TOTAL	\$1,537,404		

ANTI- POACHING

Anti- Poaching Approach

The company deploys its own anti-poaching units several times a month in each hunting area. Because company scouts do not have the mandate to arrest, several government game scouts are hired every year by the company to aid in anti-poaching efforts. Each anti-poaching unit is provided a vehicle, food rations, and other equipment to be successful in their patrols. Furthermore, every unit is comprised of five to eight individuals. Most patrols begin by driving along the border of the various areas and finding where poachers have entered. Anti-poaching patrols are conducted year-round.

Poaching in Africa takes many forms. Of the most frequently encountered are meat poaching with weapons and snares, timber poaching, and illegal charcoal burning. Destruction of habitat is just as dangerous to Africa's wildlife as animal poaching. Any and all forms of poaching are viewed as serious offenses and are heavily monitored by the anti-poaching units.

The hunting areas in Tanzania are truly wild and remote locations. The only road networks in place are the ones that are built and maintained by the hunting company. The company dispatches road construction teams several months before the beginning of the hunting season. The company is extremely proud of the fact that since 2013 over 720 kilometers of new roads have been opened. Reopening established roads and opening new roads enables the anti-poaching units to effectively patrol the area and extend the hunting range used by the hunters.

Anti- Poaching Contributions

The companies have vowed a large portion of their income to anti-poaching. This is viewed as an investment rather than an expense.

Amounts in USD
 Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1
 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$20,179	\$20,788	\$19,945
Vehicle Repair	\$4,088	\$2,852	\$2,891
Vehicle Depreciation	\$5,000	\$5,000	\$5,000
Road Opening	\$10,377	\$9,705	\$10,200
Government Anti-Poaching Contributions	\$1,415	\$617	\$798
YEARLY TOTAL	\$41,059	\$38,962	\$38,834
GRAND TOTAL	\$118,855		

Anti- Poaching Results

The anti-poaching units have made a huge impact in the hunting areas. Over the course of three years over 65 bicycles used by timber and animal poachers have been seized. In addition to this a number of poacher's contraband has been seized including over 40 axes, 30 machetes, and 40 saws. Furthermore, 6 trucks full of illegal timber have been apprehended and commandeered along with other seizures of illegally poached timber in the bush. To navigate during the rainy season and poach for fish, poachers use canoes. To date 40 canoes have been confiscated along with over 150 illegal fishing nets. Since 2013, 45 meat poachers have been arrested with over 650 rounds of ammunition and 13 rifles. Lastly, 75 timber poachers have been arrested.

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROGRAMS

Bore Hole Drilling Projects

Being located in Northern Tanzania, Lolkisale Game Controlled Area, Masai Open Area West, and Mkungunero Game Reserve have members of the Masai tribe living in the areas. Masailand is a very dry region of Tanzania with water in September until the rains in December becomes more and more scarce. The rich Masai culture is centered on their cattle. The cattle and wildlife are competing for water. Without proper measures in place, operating a hunting area amongst the Masai cattle can be a challenge. In order to ease pressure off the natural springs and waterholes, the company has taken on large expenses to drill and

2014. Although the company exceeded 2013 community development funds, it was unable to make the full contributions that it intended. However, with the funds available, another year's worth of food was donated to the Kimotorok school. Also, the company fully funded the construction of a new restroom facility for the primary school in Loiborsiret village. Another Tshs 1,300,000/- was contributed to the Monduli district to build a blood donation center and other projects. A cash contribution was given to the Woman's Welfare Group in the Narakavu village.

In addition to the contributions made by Mr. Brar's companies, American hunters have played a huge role in the villages. Almost every American hunter comes with school and medical supplies, clothes, shoes, and sports equipment. Furthermore, some hunters choose to leave cash that is directly donated to the village schools. Tens of thousands of dollars worth of supplies and cash have been contributed to the villages by American hunters.

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Community Development			
Village	2013	2014	2015
Mwamagembe	Tshs 8,700,000/-	Tshs 4,250,000/-	Tshs 10,800,000/-
Kilumbi	Tshs 6,600,000/-	Tshs 8,500,000/-	-
Kiyombo	Tshs 2,700,000/-	Tshs 4,250,000/-	-
Kivukoni	Tshs 7,800,000/-	Tshs 8,500,000/-	Tshs 5,400,000/-
Lulanga	-	-	Tshs 5,400,000/-
Minepa	-	-	Tshs 10,800,000/-
YEARLY TOTAL	Tshs 25,800,000/- \$16,226	Tshs 25,500,000/- \$15,000	Tshs 32,400,000/- \$17,513
GRAND TOTAL	Tshs 83,700,000/- \$48,739		

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Community Development			
Village	2013	2014	2015
Loiborsiret	Tshs 16,000,000/-	Tshs 6,000,000/-	Tshs 6,500,000/-
Emboret	Tshs 5,000,000/-	-	-

	\$13,243
GRAND TOTAL	Thsh 70,500,000/- \$41,198

Game Meat Donations

The company maintains a program of contributing game meat to villagers located within and next to the hunting area. An estimated 30% of the total game meat harvested throughout the season is donated to the local communities as well as to the government anti-poaching units. Doing so provides the villagers with a much needed source of protein and discourages indiscriminate meat poaching.

Community Education Programs

Having completed his Bachelor's Degree, Mr. Brar understands the impact that education can have. For this reason the company maintains continuous education programs in the schools surrounding and within the hunting areas. With the aid of school directors and teachers, the company helps conduct lessons that teach the students the importance of wildlife conservation. As explained above, these rural communities rely heavily on company financial and game meat contributions. These lessons help instill in the youth an appreciation and understanding of the wildlife and their habitat. Without hunting companies in these areas these children and families would have no use for the wildlife in the areas and a definite increase in poaching and illegal activity would result.

ADDITIONAL INFORMATION

Sustainable Hunting Management Program

Mr. Brar is very selective when it comes to employing his professional hunters. Only highly experienced professional hunters with a strong ethical and legal approach to hunting are hired. Furthermore, every professional hunter must have a firm knowledge in effective management practices to maintain the longevity of wildlife in the areas. The professional hunters do not take their jobs lightly and understand their role as stewards of wildlife. In the off-season, and when there are breaks in their hunting schedule, the professional hunters offer their expertise and accompany the anti-poaching units.

The company's professional hunters are required to sign a contract that outlines their duties and obligations. The professional hunter contract ensures a sustainable management program by:

	Hippo	1	0
	Greater Kudu	4	2
	Roan	3	2
	Sable	4	2
	Zebra	8	3
Kizigo West Game Reserve			
2014	Buffalo	20	8
	Eland	4	1
	Hartebeest	10	6
	Greater Kudu	4	2
	Roan	5	1
	Sable	5	3
	Zebra	10	6
2015	Buffalo	5	3
	Eland	2	1
	Hartebeest	4	1
	Greater Kudu	2	0
	Roan	2	1
	Sable	2	1
	Zebra	4	0
Selous Game Reserve K1			
2014	Buffalo	15	5
	Eland	2	1
	Hartebeest	10	5
	Hippo	5	2
	Sable	3	1
	Waterbuck	6	2
	Wildebeest	8	1
	Zebra	10	1
2015	Buffalo	10	5
	Eland	1	0
	Hartebeest	4	3
	Hippo	1	0
	Sable	0	0
	Waterbuck	1	0
	Wildebeest	2	1
	Zebra	3	2

Tanzania Bundu Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Lokisale Game Controlled Area			
2013	Buffalo	30	15
	Eland	7	3

	Lesser Kudu	3	2
	Oryx	5	3
	Wildebeest	15	8
	Zebra	15	6
Mkungunero Game Reserve			
2013	Buffalo	1	1
	Eland	1	0
	Hartebeest	1	0
	Greater Kudu	1	0
	Lesser Kudu	1	1
	Oryx	7	0
	Wildebeest	1	0
	Zebra	1	1
2014	Buffalo	8	8
	Eland	3	0
	Hartebeest	5	2
	Greater Kudu	2	2
	Lesser Kudu	4	3
	Oryx	2	1
	Wildebeest	5	1
	Zebra	1	0
2015	Buffalo	3	3
	Eland	1	0
	Hartebeest	3	0
	Greater Kudu	1	1
	Lesser Kudu	2	1
	Oryx	1	1
	Wildebeest	3	1
	Zebra	3	2

Sustainable Lion Hunting Management Program

The company has in place several measures to ensure the sustainable off take of lion in each hunting area. The professional hunter contract requires proper selection of hunted lion. Under no circumstances may a male lion under 6 years old be harvested. Doing so results in a fine of \$20,000 along with the government fines. It is also absolutely prohibited for any lioness to be hunted and no male lion in a pride may be harvested.

Male lion are known to leave their pride to patrol their range. So that a pride male lion is not harvested, the company maintains a lion record. Professional hunters are provided with trail cameras. Trail camera pictures are compiled and entered into the record and the professional

Human Lion Deterrent Agreements

Cattle are an easy source of food for lion in the Masailand areas. Many Masai view lion as a threat to their cattle. However, in order to prevent retaliatory killings against lion, the company has established a system of compensating the Masai for any lost cattle to lion. Since 2010, a total of \$7,500 has been paid directly to herdsman for lost cattle. This compensation system has proven effective at deterring retaliatory killings.

American Hunters

The charts below demonstrate the large role that American hunters play in the company's clientele base as well as the sharp decline in American clients:

Table 1: Rungwa Game Safaris American Hunters 2013- 2015

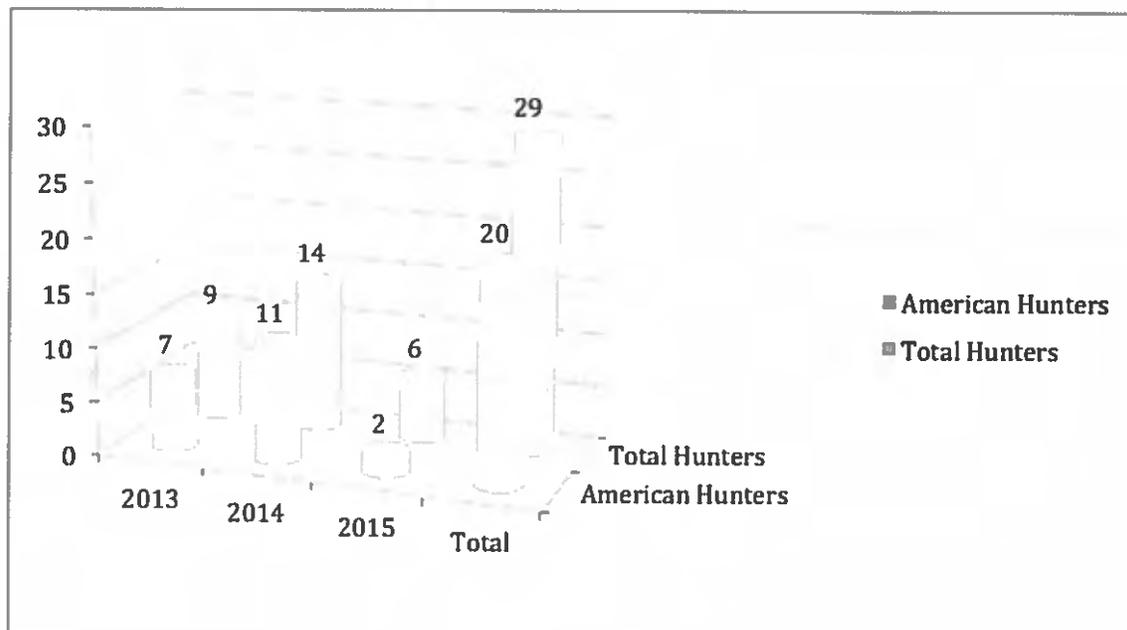


Table 3: Rungwa Game Safaris American Lion Hunters 2013- 2015

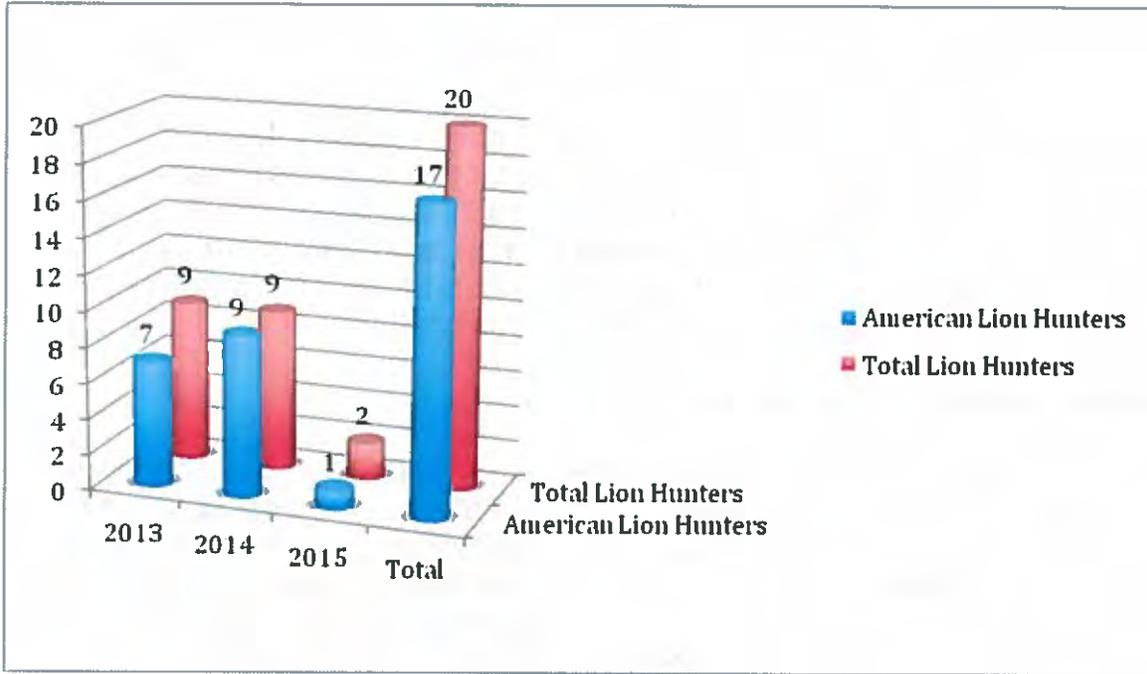
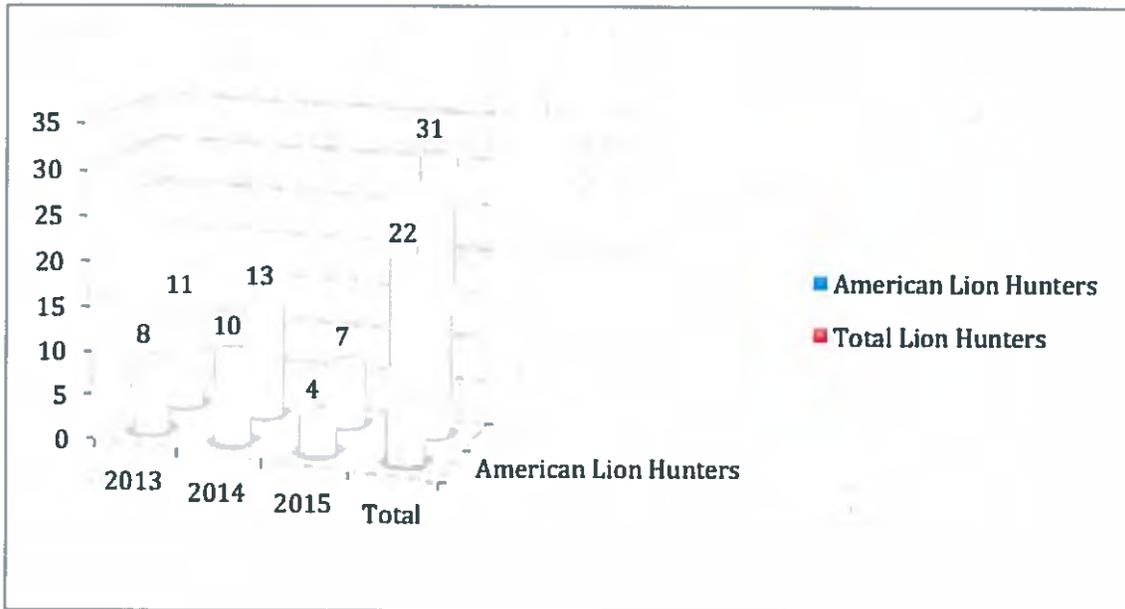


Table 4: Tanzania Bundu Safaris American Lion Hunters 2013- 2015



Exported Lion

Since 2013, six male lion were successfully harvested. The company is proud to report that all lion harvested in 2013 and 2014 were exported in

classroom education programs regarding hunting as a conservation tool teaches the students the negative impacts that poaching plays and how hunting plays a beneficial role in their daily lives. Lastly, the continuous game meat contributions serve as an active deterrent to meat poaching. The prey base species in the hunting areas continue to flourish and increase in number.

The company provides for the protection of habitat and reduces habitat loss. The anti-poaching teams treat timber poaching and illegal charcoal burning just as seriously as meat poaching. The units have had great success in seizing illegal timber and illegal timber contraband as well as destroying charcoal burning kilns. The boreholes also serve as tools for habitat protection as they have taken a great deal of pressure off the natural springs and waterholes.

Mr. Brar has specifically addressed the threat of human lion conflict by establishing agreements in the Masailand areas whereby cattle killed by lion are reimbursed their full market value. These agreements have been very effective at handling potential human lion conflict.

	Fuel Expenses	
20	Tanzania Bundu Safaris Anti-Poaching Wages and Food Expenses	2013-2015
21	Tanzania Bundu Safaris Anti-Poaching Reports	
22	Anti-Poaching and Illegal Timber Photos	
23	Rungwa Game Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgment	2013-2015
24	Tanzania Bundu Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgement	2013-2015
25	Community Development Photos	
26	Rungwa Game Safaris & Tanzania Bundu Safaris Professional Hunter Contracts	
27	Rungwa Game Safaris Allocated Quota	2013-2015
28	Tanzania Bundu Safaris Allocated Quota	2013-2015
29	Prey Base and Wildlife Photos	From Company Hunting Areas
30	Lion Photos	From Company Hunting Areas
31	"Custodians of Wilderness" Film	On file with United States Fish and Wildlife Service

MAR 15 2018

(b) (6)

61-351/622

(b) (6)

DATE 20 Feb 2018

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US Fish and Wildlife Service \$ 100.00

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MAR 23 2018

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

**IMPORT OF SPORT-HUNTED
TROPHIES
(Appendix I of CITES and/or ESA)**

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name LIMMER		1.b. First Name SCOTT		1.c. Middle Name/Initial A	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number		3.a. Alternate Telephone Number	4. E-mail address	

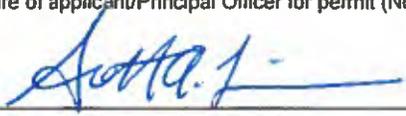
Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)			
2. Tax identification no.		3. Description of business, agency, Tribe, or institution			
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/Initial	4.d. Suffix		
5. Principal officer title		6. Primary contact name			
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address		

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, or P.O. Boxes) (b) (6)				
1.b. City LAPORTE	1.c. State COLORADO	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. [50 CFR 13.11(d)]
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)  03/12/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least 90 days for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
 - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
 - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
 - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

SAME AS PAGE 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

SCOTT A. LIMMER (b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No

Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita or African Lion.
- b. Sex (if known).

MALE

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE, MOKORE and UMKONDO RANCHES, SAVE VALLEY CONSERVANCY, BIKITA DISTRICT, MASVINGO PROVINCE, SOUTHEAST LOWVELD. Near cities of MASVINGO and MUTARE. CAMP GIS Coordinates S 20 24' 12.01" E 032 07 01.88"

- b. Date wildlife is to be hunted:

APRIL 6-26, 2019 or July 1-21, 2020.

- c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

MOKORE SAFARIS

7 STABLE CLOSE

BORROWDALE

HARARE, ZIMBABWE

GARY DUCKWORTH - LIC# 96 Email: garyduckworth@mokore.com

NEIL DUCKWORTH - LIC# 94 Email: neilduckworth@mokore.com

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

N/A

- b. Date wildlife was hunted:

N/A

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). **NONE YET - HUNT IS IN 2019.**

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: **CUAN MEREDITH**
 Business Name: **TROPHY CONSULTANTS INTERNATIONAL**
 Address: **4 JOSIAH CHINAMANO ROAD, BELMONT**
 City: **BULAWAYO**
 State/Province: **MATABELELAND**
 Country, Postal Code: **ZIMBABWE**

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?
Also See attached. Considering species such as Lion, which are trophy hunted in the SVC, it is clear that hunting has aided the conservation of this species (Groom 2012). Population trends show a steady increase in Lion within the SVC from 40 in 2005 to 284 in 2015. Annual predator spoor surveys and aerial surveys show a Lion increase of 710% since 2005.

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
Also See attached. Trophy Fee for Lion is \$15,000 of which 85% (\$12,750) goes to Bikita Rural District Council. I will pay \$2100 for a Zim Parks Ranger to be on the Lion hunt, a \$2700 levy on Lion trophy fee and daily rate, and a \$420 conservation levy. In addition, I will take some Plains Game species and pay trophy and levy fees on those animals. I will pay daily rate of \$2500, some of which will fund anti-poaching patrols and water projects.

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
Also See attached. In the area I will hunt, Mokore annually spends \$60,000 for an 8-man anti-poaching team; \$4000 in rewards to community members that turn in traps, snares, guns, and poachers; \$10,000 in local village projects; \$5500 for pumping water for wildlife; and a large lease fee to the Bikita Council for an adjacent area. Strict lion aging criteria is followed with a \$10,000 fine to PH for lions harvested under five (5) years old. Please see enclosures.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

- 10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

- 11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: Scott J. Date: 03/12/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

- 12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SVC Predators 2015

Attached for 9a

When considering species such as Lion, Leopard and Spotted Hyena, all which are Trophy hunted within the SVC, it is clear that hunting has aided the conservation of these species (Groom 2012). Population trends below show slight fluctuation and a steady increase of Lion and Leopard within the SVC. *The recent decrease in Spotted Hyena numbers can be contributed to a rapid increase in lion numbers and species competition.* Further details can be seen in *Lion Hunting in Zimbabwe's Savé Valley Conservancy, A Conservation Success Story, Dr Rosemary Groom, African Wildlife Conservation Fund.*

Populations of Lion (*Panthera leo*) , Leopard (*Panthera pardus*) and Spotted Hyena (*Crocuta crocuta*) can be depicted as follows:

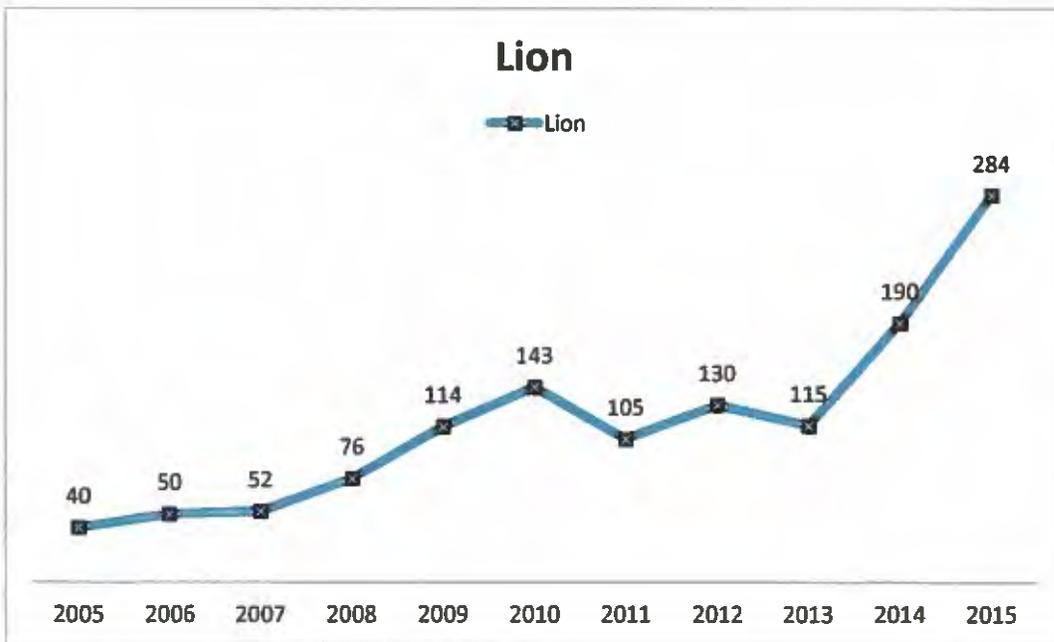


Image 1: Population trends for Lion of the SVC from 2005 to 2015.

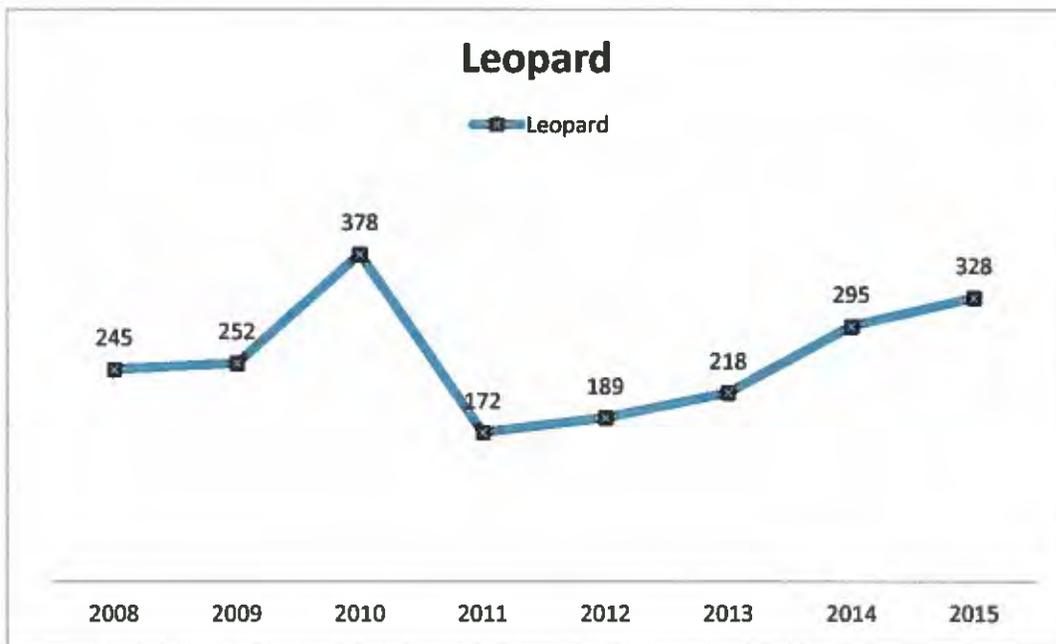
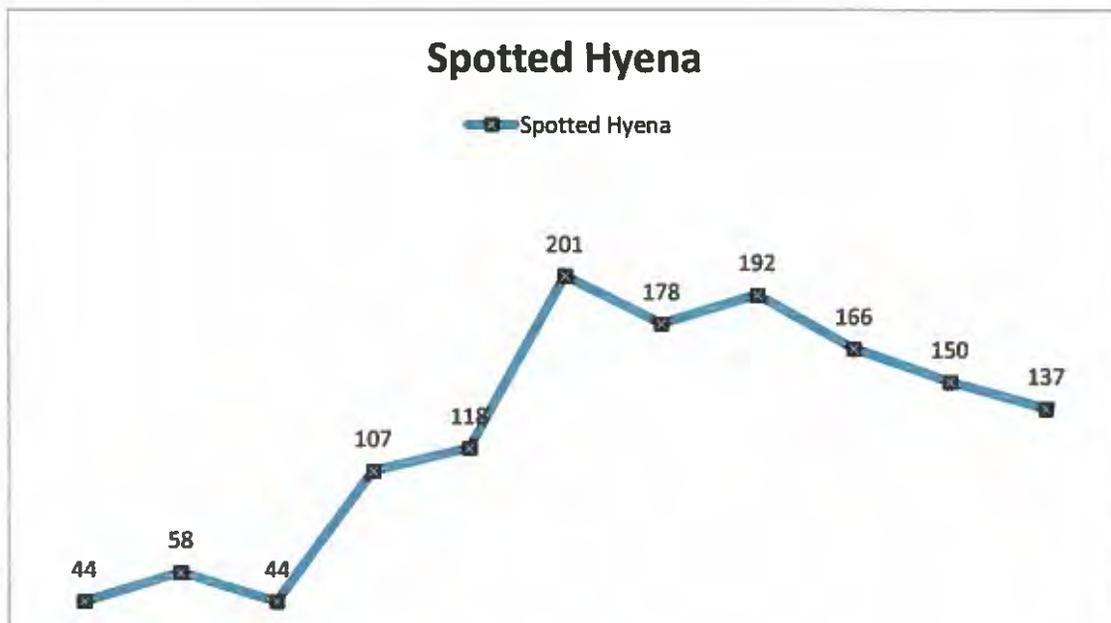


Image 2: Population trends of Leopard for the SVC from 2008 to 2015.



See page # 3.

For 9a.



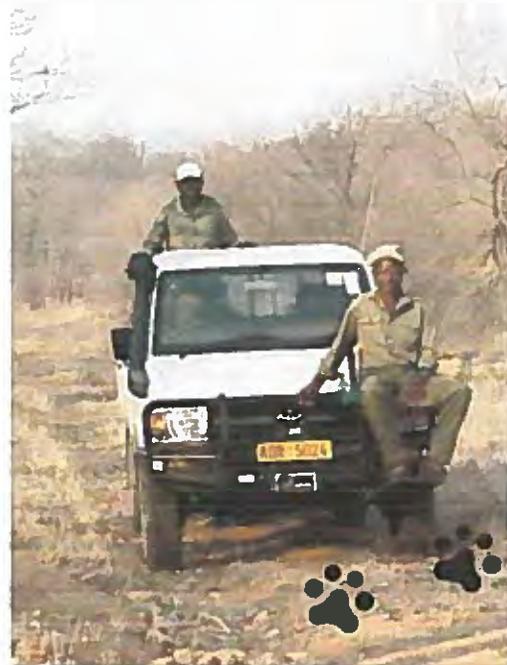
Carnivore Densities in the Savé Valley Conservancy
Results of the 2015 Spoor Survey & Wild Dog Monitoring Project
Dr Rosemary Groom and Jessica Watermeyer, African Wildlife Conservation Fund

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of the carnivores in the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) as there is a strong correlation between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2015 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.



Part of the AWCF team during the 2015 spoor survey



Methodology

The 2015 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romanach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km² of sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

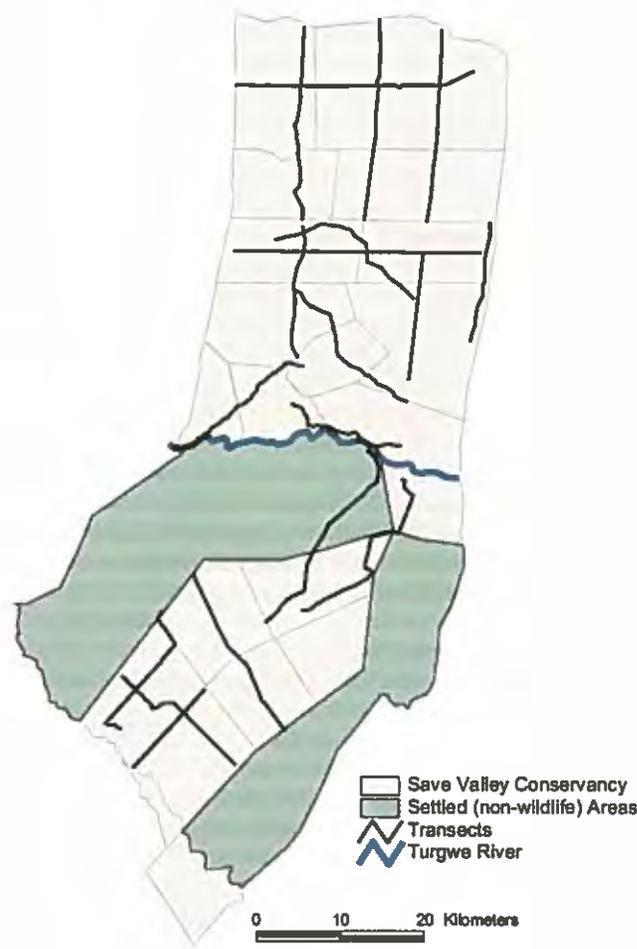
The total area of the Savé Valley Conservancy is 3490km². However, the effective wildlife area (excluding the 1051km² of resettled land), comes to only 2439km²; 1639km² north of the Turgwe river and 800km² south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 258.6km, giving a penetration ratio of 6.34. In southern SVC, the combined transect length was 131.3km, giving a penetration ratio of 6.09. For the conservancy as a whole, 389.9km were driven (penetration ratio 6.26).

Transects surveyed were the same as those used in 2007, 2008, 2009, 2010, 2011, 2012, 2013 and 2014 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Bote, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.8 km in length, with a mean transect length of 21.7 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1: Map of the transects driven – October 2015



Results

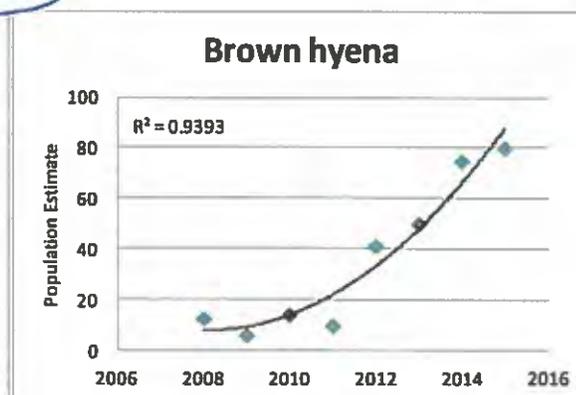
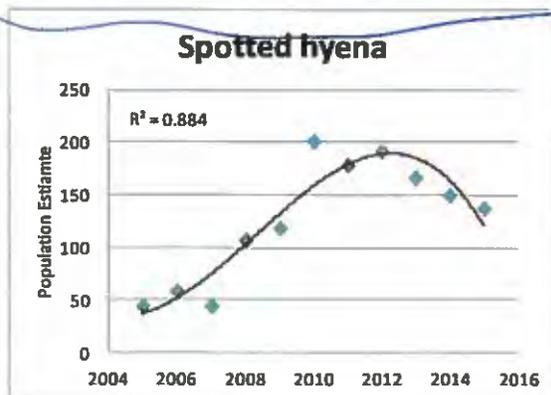
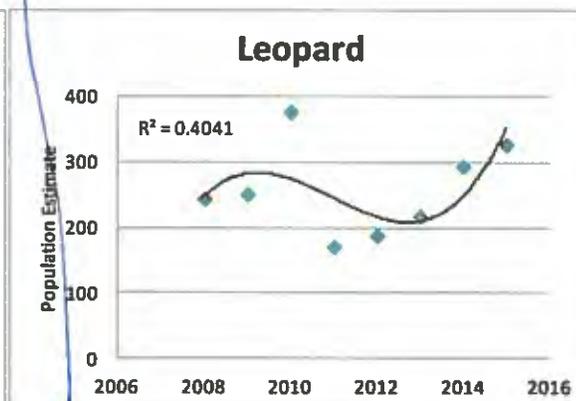
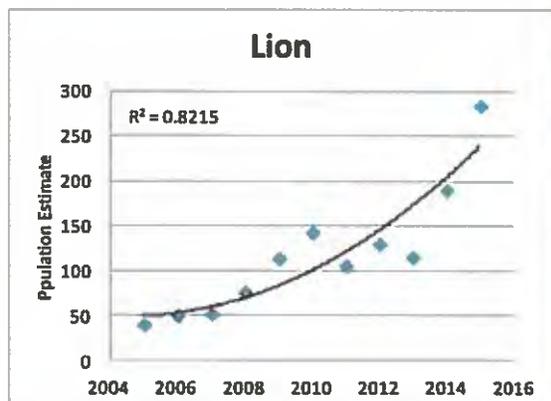
Table 1: Summary of survey parameters (2015)

Parameter	Northern SVC	Southern SVC	Total SVC
Area (km ²)	1639	800	2439
Total number of km driven	258.6	131.3	389.9
Penetration ratio	6.34	6.09	6.26

Comparison with previous years

Table 2: Population estimates of the key carnivore species in the whole of Savé Valley Conservancy from 2008-2015 (from 2005 – 2015 for lion and spotted hyena). Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts.

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Lion	40	50	52	76	114	143	105	130	115	182	284
Leopard				245	252	378	172	189	218	283	328
Spotted hyena	44	58	44	107	118	201	178	192	166	144	137
Brown hyena				12	6	14	10	41	50	72	80
African Wild dog				45	60	64	61	86	90	84	91
Black backed jackal				188	190	157	141	151	199	219	241



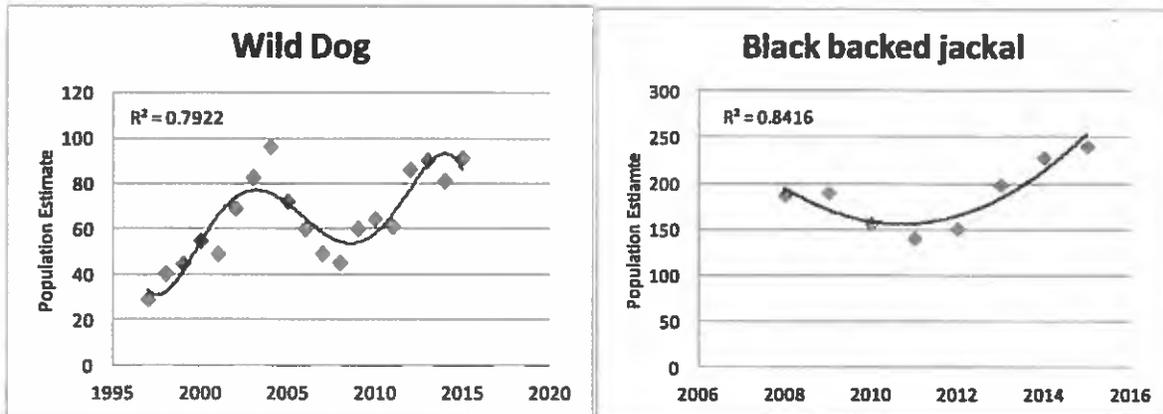


Figure 3: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts. A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.

Discussion

When looking at the graphs, the trend for each species is clear. The results show a steady increase in all species except spotted hyena, which continue to decline, and African wild dogs which appear to be levelling off.

Interpretation of results for each species

The **lion population** has increased substantially in the last two years, and there are now an estimated 284 lions in the whole of the conservancy. This is a notable increase since 2013's estimate of 115 lions and 2014's estimate of 182, and is perhaps a latent effect of no hunting for over several years. However, of the 149 lion tracks we encountered, only 28% were big adult males, with 53% identified as females/juveniles and 15% as young cubs (3% of tracks were unidentified). The number of lions in SVC equates to a **density of 11.7 lions / 100km²**. This is slightly higher than other population estimates of 9.6 lions / 100km² (average over Kruger, Hwange, Selous and Serengeti). With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

The conservancy's **leopard population** is steadily increasing after a significant drop in numbers in 2011, and there are now an estimated 328 leopards in the conservancy at a **density of 13.5 leopards / 100km²**. This is higher than that recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (7.8 / 100km²; Groom & Watermeyer 2015). Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution, although the trend is clear. In addition, from the leopard tracks we encountered we picked up a female bias of two females for every male. This should be considered when determining suitable quotas.

Spotted hyenas are the only species to display a declining population trend, from an estimated peak of 192 spotted hyena in 2012 to only 137 spotted hyenas this year. This translates to a density of 5.6 spotted hyenas / 100km², which is significantly lower than other populations (13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992) and 13.5 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2015). This decline could be a result of a number of factors, including prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc. One should also not overlook the possibility of increasing levels of conflict on the conservancy boundary (many cases of which most likely are unrecorded) which may be starting to have an impact on the population growth rate. If the population continues to decline, attention must be paid to the potential causes.

The conservancy's **brown hyena** population continues to show a steady increase. There is now an estimated 80 brown hyena in the conservancy at a density of 3.3 brown hyenas / 100km². Anecdotal evidence (sightings, den sites found etc.) also suggests an increase of brown hyena.

African wild dogs appear to be levelling off, after a population increase following a period of decline. From our comprehensive and direct monitoring of the species, there are 91 adult and yearling wild dogs in the conservancy (3.7 wild dogs / 100km²), with a potential additional 8 adult wild dogs in 3 breakaway/dispersal groups. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 247 wild dogs in the conservancy, but, when counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, spoor surveys are not an ideal tool to measure wild dog numbers because the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey can have a large effect on the results (can usually more than double actual counts).

The long term trends for this species are as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. The trend for the species over the last three years, and considering the full historical trend, indicates that we may be in for a population 'bust' or dip; particularly when one considers the increasing lion population (key competing predator) and that the wild dogs may begin to roam outside the boundaries of the conservancy in search of more space/to disperse and thus may more frequently encounter deadly edge effects.

Black backed jackals are increasing after a population dip between 2010 and 2012. There is currently an estimated 240 black backed jackals in the conservancy at a density of 9.9 black backed jackals / 100km².

Data from the spoor survey suggests there to be six **cheetahs** in the whole conservancy at a density of 0.2 cheetahs / 100 km². This is low compared to an average estimate of 1.0 cheetah / 100km² (IUCN/SSC 2009). Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low. Even if accurate population estimates cannot be obtained; only three cheetah tracks were seen in the 389.9km of transects driven. However, spoor surveys are not really appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. The Cheetah Conservation Project Zimbabwe, which has been collecting photographs of cheetah throughout Zimbabwe, and identifying individuals, estimates c. 10 adult cheetahs in SVC (Esther van der Meer, pers comm).

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict. Likewise we can trust the numbers for wild dogs, which are from the detailed population monitoring study. For leopards however, while the trends are clear, several different equations (all considered suitable for estimating leopard numbers from spoor) give very different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, taking population figures off the graphs for these species is unadvisable.

We would also like to draw attention and slight caution to the fact that we did not pick up a signal African wild cat track for the duration of the survey. Previous results estimated 13 African wild cats in 2014 and nine in 2013.

Bibliography

Balme, G.A., Slotow, R. & Hunter, L.T.B. 2009. Impact of conservation interventions on the dynamics and persistence of a persecuted leopard (*Panthera pardus*) population. *Biological Conservation* 142: 2681-2690.

Bowler, M. 1992. *Implications of large predator management on commercial ranchland in Zimbabwe*. M. Sc. Thesis. University of Zimbabwe.

Funston, P.J., Herrmann, E., Babupi, P., Kruijper, A., Jagers, H., Masule, K. & Kruijper, K. (2001) Spoor frequency estimates as a method of determining lion and other large mammal densities in the Kgalagadi Transfrontier Park. (*Book chapter*).

Funston, P.J., Frank, L., Stephens, T., Davidson, Z., Loveridge, A.J., Macdonald, D., Durant, S., Packer, C., Mosser, A., & Ferreira, S.M. (2010) Substrate and species constraints on the use of track incidences to estimate African large carnivore abundance. *Journal of Zoology*, 281, 56-65.

Davidson, Z. & Romanach, S. (2007) Estimations of lion and hyena density in the Savé Valley Conservancy using two different census techniques: spoor transects and call-up stations. *Report for SVC, WildCRU and University of Zimbabwe, TREP*.

Hayward, M.W., O'Brien, J., & Kerley, G.I.H. (2007) Carrying capacity of large African predators: Predictions and tests. *Biological Conservation*, 139, 219-229.

Mills, M.G.L. 1985. Hyaena survey of Kruger National Park: August – October 1984. *IUCN Hyaena Specialist Group Newsletter* 2: 15-25.

Pole, A.J. 1999. The behaviour and ecology of African wild dogs *Lycaon pictus* in an environment with reduced competitor density. PhD Thesis, University of Aberdeen, Aberdeen, Scotland.

Stander, P.E. (1998) Spoor counts as indices of large carnivore populations: the relationship between spoor frequency, sampling effort and true density. *Journal of Applied Ecology*, 35, 378-385.

Groom, R. & Watermeyer, J. 2015. Carnivore Densities in Gonarezhou National Park: Results of the 2015 Spoor Survey. Report for the Zimbabwe Parks and Wildlife Management Authority

Acknowledgements

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Appendix 1: All Spoor Survey Results for All Species Counted (2015)

NORTH SVC	Survey Area	Est. population	Equation Used	Est. density	Distance covered	No. of spoor	Spoor frequency	Transect length	Penetration	Spoor density
Species	North SVC (Km ²)			Y=0.3049X Y=0.6993X	Sum of transects			Sum of routes		
Black-backed jackal	1639	150.6929304	Leopard (Y=0.6993X)	9.194199536	258.6	34	7.605882353	258.6	6.337973705	13.14771848
Brown hyaena	1639	63.77079002	Lion (Y=0.3049X)	3.890835267	258.6	33	7.836363636	258.6	6.337973705	12.76102088
Cheetah	1639	5.797344548	Lion (Y=0.3049X)	0.353712297	258.6	3	86.2	258.6	6.337973705	1.160092807
Civet	1639	655.9574617	Leopard (Y=0.6993X)	40.02180974	258.6	148	1.747297297	258.6	6.337973705	57.23124517
Honey Badger	1639	93.07504524	Leopard (Y=0.6993X)	5.678770302	258.6	21	12.31428571	258.6	6.337973705	8.120649652
Leopard	1639	226.0393956	Leopard (Y=0.6993X)	13.7912993	258.6	51	5.070588235	258.6	6.337973705	19.72157773
Lion	1639	187.4474737	Lion (Y=0.3049X)	11.4366976	258.6	97	2.665979381	258.6	6.337973705	37.50966744
Spotted hyaena	1639	85.02772003	Lion (Y=0.3049X)	5.187780356	258.6	44	5.877272727	258.6	6.337973705	17.01469451
African wild dog	1639	179.717681	Lion (Y=0.3049X)	10.96508121	258.6	93	2.780645161	258.6	6.337973705	35.96287703
African Wildcat	1639	0	Leopard (Y=0.6993X)	0	258.6	0		258.6	6.337973705	0
SOUTH SVC	Survey Area	Est. population	Equation Used	Est. density	Distance covered	No. of spoor	Spoor frequency	Transect length	Penetration	Spoor density
Species	South SVC (Km ²)	(Total area)	Stander1998	(Animals/100km ²)	(km)	counted	(km/spoor)	(km)	(Area/length)	(Spoor/100km)
Black-backed jackal	800.57	89.54006566	Leopard (Y=0.6993X)	11.18453922	131.3	21	6.252380952	131.3	6.097258187	15.99390708
Brown hyaena	800.57	16.73148619	Lion (Y=0.3049X)	2.089946687	131.3	9	14.58888889	131.3	6.097258187	6.854531607
Cheetah	800.57	0	Lion (Y=0.3049X)	0	131.3	0		131.3	6.097258187	0
Civet	800.57	315.5221361	Leopard (Y=0.6993X)	39.41218583	131.3	74	1.774324324	131.3	6.097258187	56.3594821
Honey Badger	800.57	34.1105012	Leopard (Y=0.6993X)	4.260776847	131.3	8		131.3	6.097258187	6.092916984
Leopard	800.57	102.3315036	Leopard (Y=0.6993X)	12.78233054	131.3	24	5.470833333	131.3	6.097258187	18.27875095
Lion	800.57	96.67080911	Lion (Y=0.3049X)	12.07524752	131.3	52	2.525	131.3	6.097258187	39.6039604
Spotted hyaena	800.57	52.0535126	Lion (Y=0.3049X)	6.502056359	131.3	28	4.689285714	131.3	6.097258187	21.32520944
African wild dog	800.57	68.78499879	Lion (Y=0.3049X)	8.592003046	131.3	37	3.548648649	131.3	6.097258187	28.17974105
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	131.3	0		131.3	6.097258187	0

TOTAL SVC Species	Survey Area Total SVC (Km2)	Est. population (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance covered (km) Sum of transects	No. of spoor counted	Spoor frequency (km/spoor)	Transect length (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100km)
Black-backed jackal	2439	240.5939946	Leopard (Y=0.6993X)	9.864452424	389.9	55	7.089090909	389.9	6.255450115	14.10618107
Brown hyaena	2439	80.10604309	Lion (Y=0.3049X)	3.28438061	389.9	42	9.283333333	389.9	6.255450115	10.77199282
Cheetah	2439	5.721860221	Lion (Y=0.3049X)	0.234598615	389.9	3	129.9666667	389.9	6.255450115	0.769428058
Civet	2439	971.124851	Leopard (Y=0.6993X)	39.81651706	389.9	222	1.756306306	389.9	6.255450115	56.93767633
Honey Badger	2439	126.8586517	Leopard (Y=0.6993X)	5.201256732	389.9	29	13.44482759	389.9	6.255450115	7.437804565
Leopard	2439	328.0827199	Leopard (Y=0.6993X)	13.45152603	389.9	75	5.198666667	389.9	6.255450115	19.23570146
Lion	2439	284.1857243	Lion (Y=0.3049X)	11.65173121	389.9	149	2.616778523	389.9	6.255450115	38.2149269
Spotted hyaena	2439	137.3246453	Lion (Y=0.3049X)	5.630366761	389.9	72	5.415277778	389.9	6.255450115	18.4662734
African wild dog	2439	247.9472762	Lion (Y=0.3049X)	10.16593998	389.9	130	2.999230769	389.9	6.255450115	33.34188253
African Wildcat	2439	0	Leopard (Y=0.6993X)	0	389.9	0		389.9	6.255450115	0

Case Study 4

Private wildlife lands in Zimbabwe

In Zimbabwe, the devolution of wildlife use rights to landholders in 1975 resulted in a transition from game ranching being a hobby practiced by a few dozen ranchers to some 1,000 landowners and 27,000 km² conserving wildlife by 2,000, with trophy hunting a primary driver of this change (Child, 2009; Lindsey et al., 2009). Although these numbers have declined significantly under the land reform programme, and despite the current challenging economic conditions in the country, some private conservancies continue to play a crucial role in conservation. The following all rely on trophy hunting as the primary source of revenue and they would all be unviable without it; photographic tourism has been tried and has not been a viable alternative.

The Savé Valley Conservancy (SVC), covering 344,000 ha, was created in the 1990s by livestock ranchers who agreed that wildlife management could be a better use of the land than livestock. Cattle ranching operations had eliminated all elephants, rhinos, buffalo and lions, among other species, in the area. Today, SVC has around 1,500 African Elephants, 117 Black Rhinos and 43 White Rhinos, 280 Lions and several packs of the Endangered African Wild Dog. Hunting on the Sango Ranch, SVC's largest property, yields around US\$600,000 annually and employs 120 permanent workers who represent more than 1,000 family members (Lindsey et al., 2008; W. Pabst and D. Goosen, pers. comm.; SVC, n.d.; Sango Wildlife; n.d.).

The 323,000-ha Bubby Valley Conservancy (BVC) was converted from a cattle ranch 20 years ago and now has roughly 500 Lions, 700 African Elephants, 5,000 African Buffalo, 79 White Rhinos and, at 202, the third largest Black Rhino population in Africa (see Figure 3). Trophy fees in 2015 generated US\$1,380,605. BVC employs approximately 400 people and invests US\$200,000 annually in community development projects (BVC, n.d.; B. Leatham, pers. comm.).

The Cawston Game Ranch in Zimbabwe, at 12,600 ha, is much smaller than SVC and Bubby, and thus is more limited in terms of game species it can harbor. When the ranch was purchased a few native game species existed but Common Wildebeest, Plains Zebra, Giraffe, Tsessebe, Common Impala, Bushbuck, Red Hartebeest, Gemsbuck and Waterbuck had to be reintroduced. Approximately 4,500 game animals now inhabit the ranch. Large predators are limited to Leopards, Brown Hyenas and an occasional Cheetah. Hunting contributes 68% of gross revenues, derived almost wholly from plains game, particularly Sable and Tsessebe. The ranch employs 41 people and its value to local communities is estimated at US\$60,000/yr (V. Booth, unpublished data).

Attached for
9a.



Image courtesy of Wildscreen Exchange, www.wildscreenexchange.org

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

For 96.

ZIMBABWE

No. of Days	Description of Safari	US\$
5 day	Non-trophy Buffalo Package (Below 34° and Non-exportable)	\$8,500 Package
5 day	Non-trophy Buffalo Package (Below 34° and Exportable)	\$9,500 Package
7 day	Plains game Mokore	1x1 - \$550/Day
7 day	Plains game Mokore (2 Clients per 1 Pro-Hunter)	2x1 - 500 each/Day
7 day	Plains game Mokore Bowhunt	1x1 - \$500/Day
7 day	Plains game Mokore Bowhunt (2 Clients per 1 Pro-Hunter)	2x1 - \$450 each/Day
7 day	Plains game Mokore Bowhunt (3 Clients per Pro-hunter)	3x1 - \$400 each/Day
7 day	Plains game Sengwa	1x1 - \$750/Day
7 day	Plains game Sengwa (2 Clients per 1 Pro-Hunter)	2x1 - 700 each/Day
7 day	Non-trophy Elephant (Cow, Non-exportable)	\$12,000 Package
7 day	Hippo/Crocodile	1x1 - \$1,300/Day
10 day	Sable/Plains game	1x1 - \$1,000/Day
10 day	Tuskless Elephant/Plains game	1x1 - \$1,000/Day
12 day	Tuskless Elephant/Buffalo/Plains game	1x1 - \$1,300/Day
10 day	Buffalo/Plains game	1x1 - \$1,300/Day
10 day	Buffalo/Plains game (2 clients per Pro-Hunter)	2x1 - \$1,250 each/Day
15 day	Leopard/Plains game	1x1 - \$1,500/Day
15 day	Buffalo/Sable/Plains game	1x1 - \$1,300/Day
15 day	Buffalo/Leopard/Plains game	1x1 - \$1,750/Day
18 day	Buffalo/Leopard/Sable/Plains game	1x1 - \$1,750/Day
12 day	Elephant/Plains game Mokore	1x1 - \$1,500/Day
12 day	Elephant/Plains game Sengwa	1x1 - \$1,000/Day
15 day	Elephant/Buffalo/Plains game	1x1 - \$1,500/Day
21 day	Lion/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - \$2,500/Day
28 day	Lion/Elephant/Buffalo/Tuskless Ele/Sable/Plains game	1x1 - \$2,500/Day

Observer Fees - US\$250 per person per day

CITES permits for elephant, leopard and crocodile: \$150 each

Pre-baiting for cat or crocodile hunts: \$300 per day + bait trophy fees

Vehicle Transfers - \$500 one way/vehicle

Conservation Levy - \$20/person/day

4% Gov levy on total daily rates and trophy fees

All Cat or Elephant hunts on Private Land now need a Parks Ranger - \$100/day that he is needed

TROPHY FEES

	US\$		US\$
Elephant Bull - Mokore	13,000.00	Zebra Bait (Mokore only)	500.00
Lion	13,000.00	Bushpig	500.00
Elephant Bull - Sengwa	12,500.00	Warthog	500.00
Leopard	7,500.00	Caracal	500.00
Sable	5,000.00	Antbear	450.00
Hippo	5,000.00	Honey Badger	450.00
Buffalo	5,000.00	Grysbok	375.00
Crocodile	4,500.00	Serval	350.00
Tuskless Elephant	4,000.00	Civet	300.00
Nyala	4,000.00	Duiker	290.00
***Waterbuck	2,400.00	Jackal	275.00
Buffalo Cow	2,000.00	Impala males	250.00
Eland	1,950.00	Genet	225.00

Kudu	1,950.00	Porcupine	220.00
Giraffe	1,750.00	Wildcat	100.00
Hyeana - Mokore	1,500.00	Impala females/baits	100.00
Reedbuck	1,150.00	Baboon	50.00
Zebra	950.00	Monkey	50.00
Bushbuck	950.00	Mongoose	50.00
Wildebeest	850.00	Hyrax	20.00
Hyeana - Sengwa	750.00	Guinea Fowl & Francolin	5.00
Klipspringer	700.00	Birds Miscellaneous	5.00

For 9c

Mokore Safaris (Pvt), Ltd.
7 Stable Close, Borrowdale, Harare, Zimbabwe.
Operator: Duckworth Family.
garyduckworth@mokore.com
Operating in: Save Valley Conservancy and Sengwa Research
Management Area

I. DESCRIPTION OF COMPANY AND CONCESSION

Mokore Safaris has been operating in Save Valley since it's conception in late 1992. It also has been operating the the Sengwa Research Management Area since January 2013. (This is a 5 year lease with first option to roll over for a further 5 years). The Mokore Safaris section in the Save Valley is 35500 acres and provides habitat for a range of species including black and white rhino, buffalo, lion, leopard, cheetah, crocodile, wild dogs, hippo, kudu, eland, elephant, impala, bushbuck, bushpig, hyena, warthog, zebra, giraffe, waterbuck and sable (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc. Sengwa Research is 94000 acres and is home to elephant, buffalo, lion, leopard, crocodile, kudu, eland, impala, bushbuck, bushpig, hyena, warthog, zebra, reedbuck and waterbuck (lion and leopard prey). It is also home to numerous smaller creatures like grysbok, klipspringer, etc.

Our company is family-owned and has been operating in this country since 1979. We employ three full time professional hunters, 3 part time Professional Hunters and also 48 men, 5 ladies and 2 casual labour. Altogether our operations support at least 600 dependents in local villages through our continual work on the schools, roads and dams in the neighbouring village areas. Also supplies of meat and school equipment benefits the surrounding communities.

We have a written concession plan with anti-poaching and community components....

II. ANTI-POACHING COMPONENT

Mokore Safaris maintains a 8 man anti-poaching team at an annual cost of over \$60,000 in the Save Valley Conservancy and supplement Zimbabwe Parks and Wildlife Authority anti-poaching team with a vehicle driver and four rangers in the Sengwa Research Area.... Each team is equipped with a four-by-four vehicle, uniforms and boots, tents, rations, and radios. Our teams closely cooperate with the Wildlife Authority to conduct daily patrols of the concession and the neighboring properties that were taken during the land reform programme. We supply rations once a week to our scouts and assist the government game scouts in acquiring rations to ensure they are sufficiently equipped for the patrols.

We heavily patrol our areas, conducting approximately 3 patrols per day by vehicle and foot in the Save and the same again in Sengwa Research. In the past year, our teams picked up numerous snares and arrested numerous poachers hunting with dogs. Also in the Sengwa Research Area our teams with Zim Parks Rangers have arrested and also killed a number of ivory poachers. Removing snares protects the lion population by reducing incidental snaring.

We also send out road crews annually to redo the roads in the concessions, to ensure we are able to patrol effectively. These are maintained throughout the year.

In 2015, Mokore Safaris (Zimbabwe) spent approximately \$100,000 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 4000 liters of diesel for patrol vehicles. We also spent \$ 5500 on diesel for pumping water for wildlife in areas where there is not enough natural water for wildlife to survive. This does not include the costs of water pump and engine maintenance. And we made over \$ 4000 in payments of rewards.

COMMUNITY PARTICIPATION

A. Community Assistance Component

Although there are no villages in the concession itself, we share four borders (three in Sengwa and one in Save Valley) with a heavily populated communal district. We make contributions to the two closest villages and the district council. We lease an adjacent area to the concession from the council, and pay a lease fee as well as 85% of trophy fees to the Bikita Rural District Council.

We pledge an annual contribution of at least \$10,000 + in projects to the villages. We ask for a list of preferred projects at each local school and clinic. We also do the main roads annually in the Village 26, Bikita and Muchiringi Districts. We annually dredge the local dams. We supply all meat taken from any elephants harvested on our concessions to the local communities as well as supplying meat for any State Functions.

B. Conflict Control

We also take reports from villagers about problem animals and do our best to keep elephant out of community gardens during harvest. This applies to livestock losses through predation too. We obviously try and use all means to discourage problem animals before having to take more drastic control measures.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession including over 30km of piping and 12 waterholes. We drilled, operate, and maintain two boreholes and numerous pans. Pumping costs (diesel usage only) is +-\$ 5500/annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base.

V. OTHER INFORMATION

A. Prey Base

Mokore Safaris along with our other partners in the Save Valley Conservancy's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past twenty five years. Please see attached report on the game numbers increases and lion surveys report. In Sengwa research Area we estimate that our plains game (buffalo, kudu, sable, etc.) have increased by 15-20% in the last 3 years. Also, much of our anti-poaching and community assistance efforts are aimed to reduce livestock encroachment into the concession.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Save Valley Conservancy does an annual spoor survey for predators as well and an aerial survey for other species. Due to the fact that we keep tabs on the lion in our concession, we are

assured that the regulated, limited offtake is sustainable. In Sengwa Research we use trophy and age monitoring of all species hunted and manager estimates to regulate our offtakes.

C. Lion Aging Approach

Mokore Safaris has been following an age-based policy for African lion trophies since 2012, when we adopted a company rule not to harvest lion below five years of age, and to be conservative in estimating age.

As a result, on lion hunts we often pass by a number of potential lion before allowing a client to harvest a specimen. Sometimes we do not shoot a lion at all because we are so selective.

D. Lion Hunting Revenue

Lion are our highest-value species. We require 21-day safaris for lion. Our daily rate is \$2,500 per day, plus a trophy fee of \$15000 (lion). Without this revenue plus the revenue we have already lost due the ivory import bans, our anti-poaching and habitat enhancement efforts will be seriously reduced.

E. U.S. Hunters

Most of our clients (95%) are from the United States. These hunters have a conservation ethic and usually contribute above their fees to anti-poaching or our community compensation fund or community assistance programs.

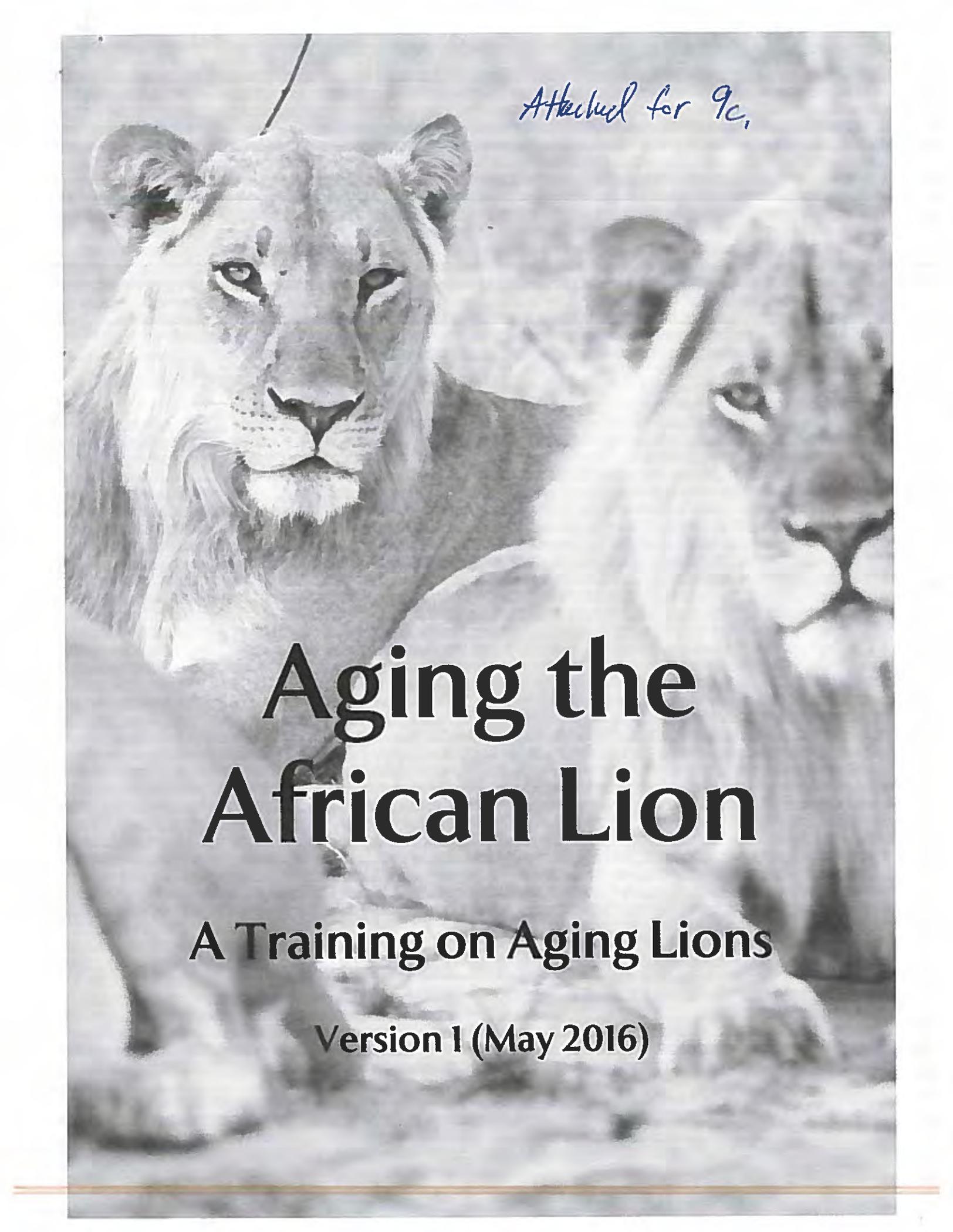
CONCLUSION

Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially lion) to local communities. Recognizing this value causes the communities to want to protect their wildlife and reduces human-wildlife conflicts.

Signed: _____

Operator Name: Gary Duckworth

Title: Managing Director



Attached for 9c,

Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Authors

Jennifer R. B. Miller
Paul Funston

Citation

Miller, Jennifer R. B. and Funston, P. 2016. Aging the African Lion. Available at <http://agingtheafricanlion.org>.

Photo credits

Matthew Becker, Colleen Begg, Henry Brink, Alayne Cotterill, Stephanie Dolrenry, Jane Hunt, Ingela Jansson, Andrew Loveridge, David MacDonald, Craig Packer, Daniel Rosengren, Ken Stratford, Martina Trinkel, Paula White, Christiaan Winterbach and Hanlie Winterbach.

Created in Partnership with:



ensures that the new male will pass on his genes to boost his reproductive fitness, while reducing the fitness of previous pride males.

The social nature of lions and common use of infanticide means that lion populations are greatly impacted by the loss of males. For example, when 72% of the adult males studied in Hwange National Park, Zimbabwe were harvested by hunters, these pride males were replaced by invading males that caused high rates of infanticide and disrupted population stability (Loveridge et al. 2007). Many of the harvested males were sub-adults less than 4 years old and had few opportunities to reproduce, making their loss especially impactful on the long-term stability of the population.

Because of this, trophy hunting must be managed in a way that reduces infanticide to achieve sustainable lion populations and long-term harvests. Simulation models suggest that sustainable trophy hunting can be accomplished by harvesting only adult males that have raised cubs to independence. (Note that females should never be harvested because their removal consistently leads to population decline). The age of physical and sexual maturation in male lion differs slightly between geographic areas of Africa, with males in East Africa maturing by around 4 years (Whitman et al. 2004) and males in southern Africa maturing by 6-7 years (Loveridge et al. 2007). Reproducing and raising cubs to independence typically requires an additional 1-2 years.

Studies have found that to be sustainable (achieve stable lion populations and maximum harvests), trophy hunting should harvest lions in East Africa (Tanzania) older than 6 years (Whitman et al. 2004, 2007) and lions in southern Africa older than 8 years. As a general rule, harvesting males older than 8 years maximizes both the quantity and the quality of the long-term harvest. The science of aging lions in part grew out of the need for more reliable indicators of age to make trophy hunting sustainable.

Resources

Resources for Learning to Age Lions

The ability to accurately age lions takes time and practice to develop, but is the sign of a dedicated and accomplished expert who understands lion biology. We encourage you to take advantage of the other resources that were developed alongside this training by visiting <http://AgingTheAfricanLion.org>, including:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

Before You Begin: Test Yourself!

To see your improvement after taking this training, we encourage you to test your lion aging score online at <http://AgingTheAfricanLion/TestYourself.org>. When you finish the training, test yourself again!

Training

How to Age a Lion

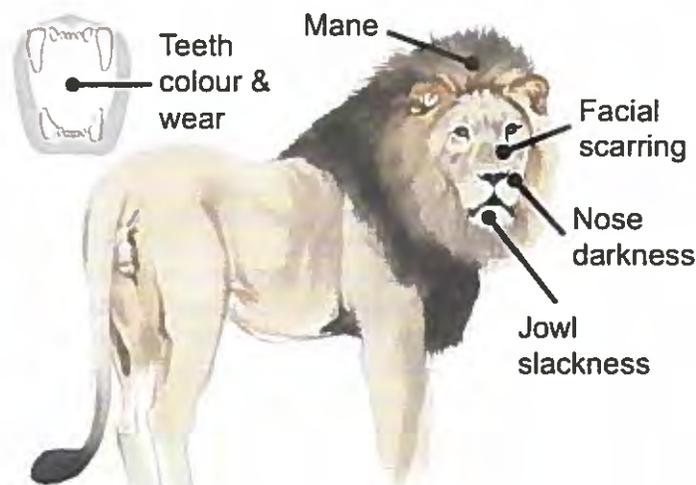
Scientific research on lions across Africa shows that a male lion's appearance changes with five main physical characteristics that can be distinguished into four age classes (Miller et al. 2016):

Aging Characteristics

- Teeth color and wear
- Facial scarring
- Nose darkness
- Mane
- Slack jowl

Age classes

- 1-2 years
- 3-4 years
- 5-6 years
- ≥7 years



Minor variation in each physical characteristic between lions of the same age means that a single trait should never be used alone to determine age: always reference 3-4 characteristics to reliably narrow down a lion's age. This will ensure the greatest accuracy possible.

Aging Characteristics

1. Teeth Color and Wear

Teeth become more yellow and worn with age.



1-2 years
White, sharp



3-4 years
Light yellow,
sharp or lightly worn



5-6 years
Light yellow,
lightly or heavily worn



≥7 years
Dark yellow, lightly
or heavily worn

2. Facial Scarring

Lions acquire scarring and pocketing on their faces due to fighting.



1-2 years
No scarring



3-4 years
No or light scarring



5-6 years
Light scarring



≥7 years
Heavy scarring

3. Nose Darkness

Lion noses darken from pink to black with age.



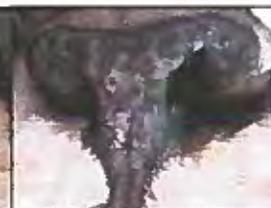
1-2 years
Mostly pink
0-30% black



3-4 years
Slightly black
20-60% black



5-6 years
Mostly black
40-70% black



≥7 years
Nearly all black
40-100% black

4. Mane

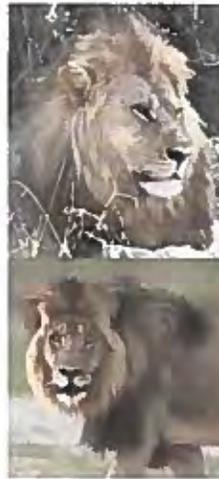
A male's mane develops from a Mohawk to a full, thick mane covering his forehead and shoulders.



1-2 years
No hair or very short Mohawk on head. No or very sparse mane around face, chest and neck. No shoulder mane.



3-4 years
Long Mohawk on head, bare patches between Mohawk and ears. Short mane around face, chest and neck. No shoulder mane.



5-6 years
No Mohawk. Full, long mane with forehead and shoulders filled in.



≥7 years
Full, long mane, frayed or frizzy hair.

Note: Other traits (facial scarring, teeth wear) will be more indicative of this age.

Note: Some regional differences occur in mane appearance. Lions in southern and high-lying Africa (e.g. Hwange in Zambia and Serengeti in Tanzania) show larger, thicker manes whereas lions in west-central and eastern low-lying Africa (e.g. Niassa in Mozambique and Seleous in Tanzania) show thinner, sparser manes.

5. Slack Jowl

A lion's back lip hangs in about half of individuals older than 7 years.



1-2 years
 No slack jowl

3-4 years
 No slack jowl

5-6 years
 No slack jowl

≥7 years
 Slack jowl in 50% of lions in this age group

Next Steps

Photo Galleries & Pocket Guides

After finishing this training, check out the other resources available at

<http://AgingTheAfricanLion.org>:

- Test – Measure your lion aging accuracy
- Photo gallery – Images of known-age lions
- Pocket guides – Quick tips for aging

After You Finish: Re-Test Yourself

To see your improvement after reviewing this training and the online photos and pocket guides, re-test your lion aging accuracy online at

<http://AgingTheAfricanLion/TestYourself.org>.

Pocket Guides

Pocket guides to use for quick reference in the field are available on the last pages of this course packet and online at <http://AgingTheAfricanLion.org/Resources.html>

Additional Reading

Links to many of these articles are freely available at <http://AgingTheAfricanLion.org>.

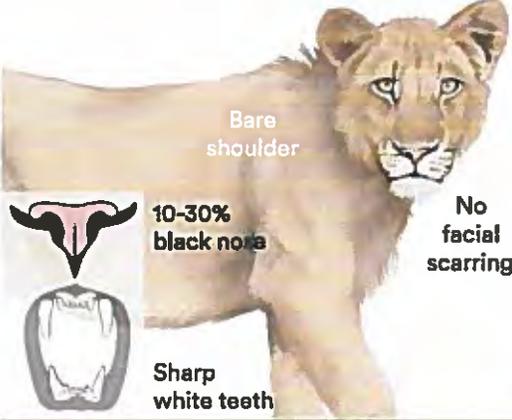
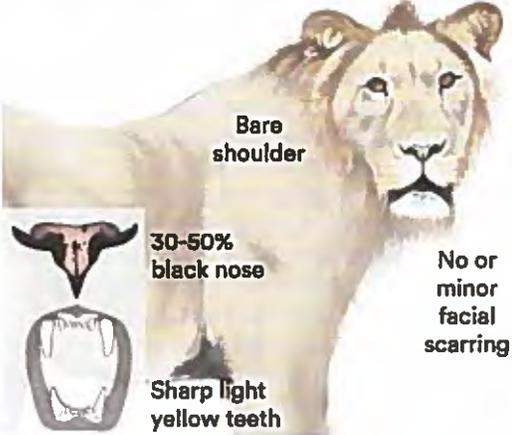
Lion Biology

- Funston, P. J., M. G. L. Mills, P. R. K. Richardson, and A. S. van Jaarsveld. 2003. [Reduced dispersal and opportunistic territory acquisition in male lions \(*Panthera leo*\)](#). *Journal of Zoology* 259:131–42. **Free!**
- Mosser, A., and C. Packer. 2009. [Group territoriality and the benefits of sociality in the African lion, *Panthera leo*](#). *Animal Behaviour* 78:359–370.
- Packer, C., D. Scheel, and A. E. Pusey. 1990. [Why lions form groups: food is not enough](#). *American Naturalist* 136:1–19. **Free!**
- Pusey, A. E., and C. Packer. 1994. [Non-offspring nursing in social carnivores: minimizing the costs](#). *Behavioral Ecology* 5:362–374.

Aging Lions and Sustainable Trophy Hunting

- Creel, S., M'soka, J., Droge, E., Rosenblatt, E.G., Becker, M. S., Matandiko, W., Simpamba, T. 2016. [Assessing the sustainability of African lion trophy hunting, with recommendations for policy](#). *Ecological Applications*, doi: 10.1002/eap.1377.
- Loveridge, A. J., A. W. Searle, F. Murindagomo, and D. W. Macdonald. 2007. [The impact of sport-hunting on the population dynamics of an African lion population in a protected area](#). *Biological Conservation* 134:548–558.
- Miller, J., Funston, P. J., Balme, G., Lindsey, P. A., Loveridge, A. J., Becker, M. S., Begg, C., Brink, H., Cotterill, A., Dolrenry, S., Hunt, J. E., Jansson, I., MacDonald, D. W., Mandisodza-Chikerema, R., Packer, C., Rosengren, D., Stratford, K., Trinkel, M., White, P., Winterbach, C., Winterbach, H. E. K. 2016. [Aging traits and sustainable trophy hunting of African lions](#). *Biological Conservation* 201:160–168. **Free!**
- Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., Watson, F., Merkle, J., Mwape, H. 2014. [Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions](#). *Biological Conservation* 180:176–186. **Free!**
- White, P. A., Belant, J. L. 2016. [Individual variation in dental characteristics for estimating age of African lions](#). *Wildlife Biology* 22: 71–77. **Free!**
- White, P. A., Ikanda, D., Ferrante, L., Chardonnet, P., Mesochina, P., Cameriere, R. 2016. [Age estimation of African lions *Panthera leo* by ratio of tooth areas](#). *PLoS ONE*. Doi: 10.6084/m9.figshare.3159430. **Free!**
- Whitman, K. L., Starfield, A. M., Quadling, H. S., and C. Packer. 2004. [Sustainable trophy hunting of African lions](#). *Nature* 428:175–178. **Free!**
- Whitman, K. L., Starfield, A. M., Quadling, H., Packer, C. 2007. [Modeling the effects of trophy selection and environmental disturbance on a simulated population of African lions](#). *Conservation Biology* 21:591–601. **Free!**

Quick Guide to Southern and High-Lying Africa (e.g. Hwange in Zimbabwe, Serengeti in Tanzania)

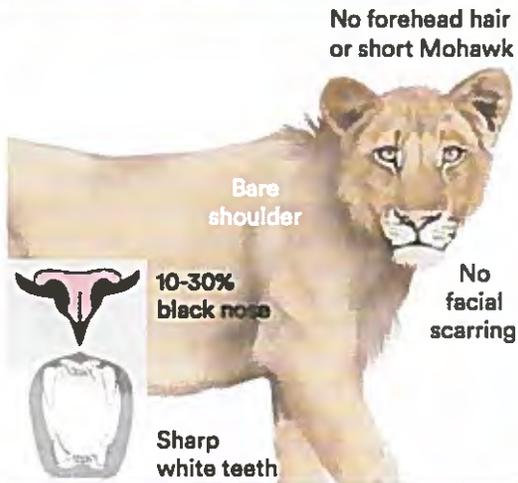
MATURE CUBS: 1-2 years	PRIME ADULTS: 5-6 years
<p>No forehead hair or short Mohawk</p>  <p>Bare shoulder</p> <p>10-30% black nose</p> <p>No facial scarring</p> <p>Sharp white teeth</p>	<p>Forehead covered, no Mohawk</p>  <p>Shoulder filling in</p> <p>50-70% black nose</p> <p>Minor facial scarring</p> <p>Lightly worn light yellow teeth</p>
SUB-ADULTS: 3-4 years	OLDER ADULTS: 7 years & older
<p>Short or long Mohawk</p>  <p>Bare shoulder</p> <p>30-50% black nose</p> <p>No or minor facial scarring</p> <p>Sharp light yellow teeth</p>	<p>Slack jaw</p> <p>Long or thinning frizzy mane</p>  <p>Covered shoulder</p> <p>70-100% black nose</p> <p>Heavy facial scarring</p> <p>Heavily worn dark yellow teeth</p>

Available as complete pocket guide at <http://AgingTheAfricanLion/Resources.org>.

Quick Guide to West-Central and Eastern Low-Lying Africa

(e.g. Niassa in Mozambique, Seleous in Tanzania)

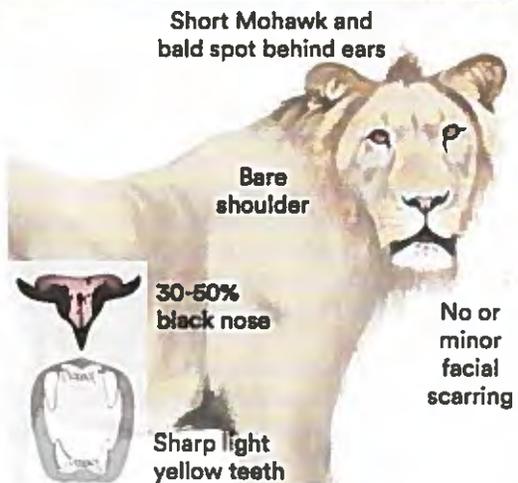
MATURE CUBS: 1-2 years



PRIME ADULTS: 5-6 years



SUB-ADULTS: 3-4 years



OLDER ADULTS: 7 years & older



Available as complete pocket guide at <http://AgingTheAfricanLion/Resources.org>.

Attached for 9c

Mokore Safaris PH Rules

See pg #1+2.

1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save Valley hunts please refuel at Nyika on the way in. For Sengwa Hunts please refuel at Gokwe.
2. Paperwork – Please can all PHs fill in the skimmers books complete with all measurements and details. Also those hunting in Sengwa please make sure that the measurements of all trophies is completed on the ZPWMA kill returns supplied in the file.
- ③ 3. Mokore Safaris is attempting to maintain the quality of our herds for the future and so the following will apply (no excuses tolerated):
 - a. Any soft – top buffalo will attract a fine as follows:
 - i. Over 43" spread - \$1000
 - ii. 40 – 43" spread - \$500
 - iii. 35 – 40" spread - \$ 200
 - iv. Below 35" – fire at will!

b. Any lion under the age of 5 years - \$ 10 000

c. Any sable without at least 2" secondary thickening - \$200

d. Any elephant under 40 lbs in the Save - \$500

(b) (6)

82-26/1070

(b) (6)

DATE 3-14-18

PAY TO USFWS \$ 100.00
THE ORDER OF One Hundred and no DOLLARS

REQUIRE WATER RESISTANT SPECIAL INK FOR SECURITY

Heat Reactive Ink

1 First National Bank
Fort Collins, CO

MEMO Permit Application Fee

[Signature]

(b) (6)

ON BACK

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
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SHANE MAHONEY
RENEE SNIDER

March 22, 2018

RCVD MAR 27 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km² property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over \$61,000/year in anti-poaching, \$45,000/year in community projects, and \$30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: David Turner

Name: David (b) (6) Turner

Date: 3/13/2018



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

RCVD MAR 27 2011

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Turner	1.b. First name David	1.c. Middle name or initial W	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Middleton	1.c. State Idaho	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province
1.f. Country USA			
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) same			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <u>08US188472/9</u> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Ua Turner</u> <u>3-12-2018</u> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo, African Lion
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
K1 Selous Game Reserve
 - b. Date wildlife is to be hunted:
August 16-September 5, 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skin, Skull, claws, teeth
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Rungwa Game Safaris
1 Sable Square Shopping Village Kisongo, Arusha Tanzania

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Rungwa Game Safaris
Business Name:
Address: 1 Sable Square
Address: Shopping Village
City: Kisongo, Arusha
State/Province:
Country, Postal Code: Tanzania

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

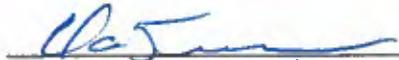
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 3/12/2018
Dave Turner

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

David W. Turner

(b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE

Rungwa Game Safaris

T A N Z A N I A



P.O. Box 13946 Arusha, Tanzania

Tel: (255) 748 475779

Email: info@rungwasafaris.com

Website: www.rungwasafaris.com

RE: Operator Enhancement Report

COMPANY DESCRIPTION

Harpreet Brar is the owner and Managing Director of Rungwa Game Safaris and Tanzania Bundu Safaris. Upon receiving a Bachelor's Degree in Business Administration and Advertising from John Brown University USA, Mr. Brar began his apprenticeship to become a professional hunter. In 1997, he became a licensed professional hunter. With the lifelong goal of owning his own hunting company, he started Rungwa Game Safaris in 2000. Mr. Brar is a dedicated conservationist and firm believer in sustainable hunting practices to protect Africa's wildlife and habitat. In 2010, he acquired Tanzania Bundu Safaris. Mr. Brar has become one of Tanzania's largest outfitters providing quality safaris while supporting and enhancing Tanzania's wildlife and habitat.

The two companies are managed and operated out of the central office in Arusha, Tanzania. The company employs 150 camp staff, four professional hunters, and four administrative personnel. Even though the hunting season lasts from July to December, the company believes it is their corporate social responsibility to employ their staff year-round. Approximately, 25% of camp staff is comprised of individuals from the neighboring communities. The company further supports the neighboring communities by hiring casual laborers for construction and road opening. Through this employment and by maintaining community development projects and funding, the company has built and maintained a strong relationship with neighboring villages.

Mr. Brar is also the owner Nimali Africa Safari, a photographic company with camps in the Tarangire National Park. However, he maintains that hunting is the best form of conserving wildlife and habitat.

In 2015, each hunting company must submit a three-year report to the Ministry of Natural Resources and Tourism. The basis of the reports are payment of government fees, conducting hunting safaris in a legal and ethical manner, company anti-poaching expenses and results, and community development. In December of 2015, each company received a letter from the Ministry applauding their excellence and commitment to conservation. The companies are pre-qualified for renewal of their currently allocated areas by continuing their current efforts.

DESCRIPTION OF HUNTING AREAS

RUNGWA GAME SAFARIS

Rungwa Mpera Game Reserve & Kizigo West Game Reserve

Rungwa Mpera Game Reserve and Kizigo West Game Reserve share a border as well as with the Ruaha National Park. This allows the anti-poaching units to effectively monitor both areas. Rungwa Mpera Game Reserve spans 2,068 square kilometers and Kizigo West Game Reserve is 1,288 square kilometers. These areas have an established road network. The areas act as a dry season refuge for the Ruaha National Park due to natural springs and pools. Lion are abundant in these areas because of the large prey base protected by the anti-poaching teams. Wildlife frequently viewed in the areas are buffalo, kudu, sable, roan, eland, zebra and hartebeest. The company acquired Kizigo West Game Reserve at the beginning of 2014.

Selous Game Reserve K1

The Selous Game Reserve is the largest game reserve dedicated to hunting and photographic tourism. The vast majority of the Reserve has been set aside for hunting. Selous K1 Game Reserve is located in the far western part of the Reserve covering 332 square kilometers. The area boasts a strong lion population. The Selous Game Reserve is home to the largest population of buffalo in Africa and the company's anti-poaching campaigns help maintain strong buffalo numbers in the area. Furthermore, healthy herds of elephant, sable, hippo, wildebeest, zebra, waterbuck, impala, hippo, and crocodile are present. The company obtained Selous Game Reserve K1 in early 2014.

TANZANIA BUNDU SAFARIS

Lolkisale Game Controlled Area, Masai Open Area West & Mkungunero Game Reserve

All three of these areas are located in Northern Tanzania in what is commonly referred to as Masailand. These areas are unique because members of the Masai tribe reside within the hunting area. All three areas border the Tarangire National Park, and Lolkisale Game Controlled Area and Masai Open Area West share a border with each other. The areas contain many unique Masailand species such as lesser kudu, fringe eared oryx, and gerenuk as well as elephant, wildebeest, zebra, buffalo and hartebeest. For part of the year, the area is home to the Eastern White Bearded Wildebeest and Zebra migration that occurs in the Tarangire National Park and its surrounding areas.

Lolkisale Game Controlled Area is 1,082 square kilometers, Masai Open Area West is 985 square kilometers, and Mkungunero Game Reserve is 767 square kilometers.

GOVERNMENT FEES

Since 2013 the company has paid \$2,467,274 in government fees. These funds are used by the government to pay salaries to the game officers and fund conservation projects.

The company has paid fewer government fees in 2015, and a similar result is expected in 2016. This decline is due to fewer lion safaris booked by U.S. citizens as a result of the listing of African lion under the U.S. Endangered Species Act. Three lion hunts were cancelled and fully reimbursed for the 2016 season.

Amounts in USD

Rungwa Game Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$60,000	\$120,000	\$120,000
License Fees	\$42,850	\$87,450	\$19,600
Trophy Fees	\$138,700	\$253,470	\$67,000
TALA License	\$1,200	\$2,400	\$1,200
PH License Fees	\$4,000	\$8,000	\$4,000
YEARLY TOTAL	\$246,750	\$471,320	\$211,800
GRAND TOTAL		\$929,870	

Tanzania Bundu Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$138,000	\$138,000	\$138,000
License Fees	\$117,300	115,354	\$55,300
Trophy Fees	\$294,600	\$323,760	\$185,490
TALA License	\$2,400	\$3,000	\$2,200
PH License Fees	\$8,000	\$9,000	\$7,000
YEARLY TOTAL	\$560,300	\$589,114	\$387,990
GRAND TOTAL	\$1,537,404		

ANTI- POACHING

Anti- Poaching Approach

The company deploys its own anti-poaching units several times a month in each hunting area. Because company scouts do not have the mandate to arrest, several government game scouts are hired every year by the company to aid in anti-poaching efforts. Each anti-poaching unit is provided a vehicle, food rations, and other equipment to be successful in their patrols. Furthermore, every unit is comprised of five to eight individuals. Most patrols begin by driving along the border of the various areas and finding where poachers have entered. Anti-poaching patrols are conducted year-round.

Poaching in Africa takes many forms. Of the most frequently encountered are meat poaching with weapons and snares, timber poaching, and illegal charcoal burning. Destruction of habitat is just as dangerous to Africa's wildlife as animal poaching. Any and all forms of poaching are viewed as serious offenses and are heavily monitored by the anti-poaching units.

The hunting areas in Tanzania are truly wild and remote locations. The only road networks in place are the ones that are built and maintained by the hunting company. The company dispatches road construction teams several months before the beginning of the hunting season. The company is extremely proud of the fact that since 2013 over 720 kilometers of new roads have been opened. Reopening established roads and opening new roads enables the anti-poaching units to effectively patrol the area and extend the hunting range used by the hunters.

Anti- Poaching Contributions

The companies have vowed a large portion of their income to anti-poaching. This is viewed as an investment rather than an expense.

Three Land Cruisers have been dedicated for anti-poaching purposes. All fuel, maintenance for the vehicles, as well as the wages and food are provided by the company. In 2013, Rungwa Game Safaris funded the engine overhaul of a government anti-poaching vehicle as well. The cost of the overhaul was \$1,250.

In 2014, Rungwa Game Safaris contributed four off road motorbikes to the government anti-poaching units in the Kizigo Game Reserve and Rungwa Game Reserve because navigating the area during the rainy season is difficult. The combined cost of all four motorbikes was \$4,375. The company also donated 7,234 liters of diesel worth \$9,000 to the government anti-poaching units of the Rungwa/Kizigo Game Reserves.

In 2015, the company funded the construction of a bridge spanning a river that proved to be dangerous for the anti-poaching units during the rains. Construction of the bridge allowed the Makawasa Game Post to be open year-round. The total construction cost of the bridge was \$4,418.

The company also contributed \$5,000 to the Tanzania Wildlife Research Institute for pilot training. This contribution helped pay for Captain Anna Titus Laroya to attend a training program at the American Flyers School in Addison, Texas. It is expected this training will help combat poaching through better aerial surveillance.

A complete breakdown of anti-poaching contributions for each company is explained below:

Amounts in USD

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$28,157	\$11,970	\$14,300
Vehicle Repairs	\$6,108	\$3,722	\$3,521
Vehicle Depreciation	\$10,000	\$10,000	\$10,000
Road Opening	\$24,213	\$28,441	\$12,691
Government Anti-Poaching Contributions (described above)	\$1,250	\$13,375	\$9,418
YEARLY TOTAL	\$69,728	\$67,508	\$49,930
GRAND TOTAL		\$187,166	

Amounts in USD

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$20,179	\$20,788	\$19,945
Vehicle Repair	\$4,088	\$2,852	\$2,891
Vehicle Depreciation	\$5,000	\$5,000	\$5,000
Road Opening	\$10,377	\$9,705	\$10,200
Government Anti-Poaching Contributions	\$1,415	\$617	\$798
YEARLY TOTAL	\$41,059	\$38,962	\$38,834
GRAND TOTAL		\$118,855	

Anti- Poaching Results

The anti-poaching units have made a huge impact in the hunting areas. Over the course of three years over 65 bicycles used by timber and animal poachers have been seized. In addition to this a number of poacher's contraband has been seized including over 40 axes, 30 machetes, and 40 saws. Furthermore, 6 trucks full of illegal timber have been apprehended and commandeered along with other seizures of illegally poached timber in the bush. To navigate during the rainy season and poach for fish, poachers use canoes. To date 40 canoes have been confiscated along with over 150 illegal fishing nets. Since 2013, 45 meat poachers have been arrested with over 650 rounds of ammunition and 13 rifles. Lastly, 75 timber poachers have been arrested.

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROGRAMS

Bore Hole Drilling Projects

Being located in Northern Tanzania, Lolkisale Game Controlled Area, Masai Open Area West, and Mkungunero Game Reserve have members of the Masai tribe living in the areas. Masailand is a very dry region of Tanzania with water in September until the rains in December becomes more and more scarce. The rich Masai culture is centered on their cattle. The cattle and wildlife are competing for water. Without proper measures in place, operating a hunting area amongst the Masai cattle can be a challenge. In order to ease pressure off the natural springs and waterholes, the company has taken on large expenses to drill and

maintain boreholes. The company has reached an agreement with the Masai in the Masailand areas that boreholes are for the exclusive use of the wildlife. This allows the areas to maintain a high population of elephant as well as prey base species such as buffalo, zebra, kudu, and hartebeest.

Two boreholes were successfully drilled and reached water out of seven attempts. Drilling each borehole costs approximately \$22,000. One borehole is located in Lolkisale Game Controlled Area and the other in Masai Open Area West. Water is pumped everyday of the year continuously.

Amounts in USD

Borehole Drilling and Maintenance Expenses (2006- 2015)	
Borehole Item	Amount
Drilling	\$154,000
Water Pumps	\$8,000
Fuel*	\$50,000
Maintenance**	\$30,000
GRAND TOTAL	\$242,000

*Average fuel consumption per water pump is \$2,500 per year for two pumps since 2006.

** Average maintenance costs for the boreholes are \$1,500 per year for two pumps since 2006.

COMMUNITY DEVELOPMENT PROGRAMS

Community Development

Every year, the company meets and exceeds its mandatory \$5,000 area community development fee obligation. Because the company invests directly in the villages and maintains a continuous presence, the villagers understand the important role hunting plays in the daily lives.

Among the company's contributions, which it seeks to increase and improve every year in 2013, the company funded the materials for the construction of a secondary school in Loiborsiret village.

In 2014 in Kimotorok village the company funded the construction of teachers' residence, the purchase of 70 classroom desks, and enough food for the children and teachers for one year. Furthermore, the company funded the construction of laboratories for the secondary schools located in Loiborsiret and Lolkisale villages.

The threat of the lion listing in 2015 had a damaging effect on the company. The company suffered a 50% decrease in safaris compared to

2014. Although the company exceeded 2013 community development funds, it was unable to make the full contributions that it intended. However, with the funds available, another year's worth of food was donated to the Kimotorok school. Also, the company fully funded the construction of a new restroom facility for the primary school in Loiborsiret village. Another Tshs 1,300,000/- was contributed to the Monduli district to build a blood donation center and other projects. A cash contribution was given to the Woman's Welfare Group in the Narakavu village.

In addition to the contributions made by Mr. Brar's companies, American hunters have played a huge role in the villages. Almost every American hunter comes with school and medical supplies, clothes, shoes, and sports equipment. Furthermore, some hunters choose to leave cash that is directly donated to the village schools. Tens of thousands of dollars worth of supplies and cash have been contributed to the villages by American hunters.

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Community Development			
Village	2013	2014	2015
Mwamagembe	Tshs 8,700,000/-	Tshs 4,250,000/-	Tshs 10,800,000/-
Kilumbi	Tshs 6,600,000/-	Tshs 8,500,000/-	-
Kiyombo	Tshs 2,700,000/-	Tshs 4,250,000/-	-
Kivukoni	Tshs 7,800,000/-	Tshs 8,500,000/-	Tshs 5,400,000/-
Lulanga	-	-	Tshs 5,400,000/-
Minepa	-	-	Tshs 10,800,000/-
YEARLY TOTAL	Tshs 25,800,000/- \$16,226	Tshs 25,500,000/- \$15,000	Tshs 32,400,000/- \$17,513
GRAND TOTAL	Tshs 83,700,000/- \$48,739		

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Community Development			
Village	2013	2014	2015
Loiborsiret	Tshs 16,000,000/-	Tshs 6,000,000/-	Tshs 6,500,000/-
Emboret	Tshs 5,000,000/-	-	-

Mswakini Juu	Tshs 3,000,000/-	-	-
Kimotorok	-	Tshs 124,000,000/-	Tshs 23,400,000/-
Lolkisale	-	Tshs 1,000,000/-	-
Narakavu	-	-	Tshs 2,000,000/-
Gov't Development Funding	-	-	Tshs 1,300,000/-
YEARLY TOTAL	Tshs 29,000,000/- \$18,238	Tshs 131,000,000/- \$77,058	Tshs 33,200,000/- \$17,945
GRAND TOTAL	Tshs 193,000,000/- \$113,241		

Casual Labor Employment

Due to the remoteness of the villages neighboring the hunting areas, villagers are limited in their employment opportunities. Every year the company employs villagers, and helps strengthen the company's relationship with them.

Amounts in Tanzania Shillings

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Village Employment Expenses	
Year	Village Employment Expenses
2013	Tshs 19,250,000/- \$12,106
2014	Tshs 26,592,500/- \$15,642
2015	Tshs 28,740,000/- \$15,535
GRAND TOTAL	Tshs 74,582,500 \$43,283

Amounts in Tanzania Shillings

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Village Employment Expenses	
Year	Village Employment Expenses
2013	Tshs 22,050,000/- \$13,867
2014	Tshs 23,950,000/- \$14,088
2015	Tshs 24,500,000/-

	\$13,243
GRAND TOTAL	Thsh 70,500,000/- \$41,198

Game Meat Donations

The company maintains a program of contributing game meat to villagers located within and next to the hunting area. An estimated 30% of the total game meat harvested throughout the season is donated to the local communities as well as to the government anti-poaching units. Doing so provides the villagers with a much needed source of protein and discourages indiscriminate meat poaching.

Community Education Programs

Having completed his Bachelor's Degree, Mr. Brar understands the impact that education can have. For this reason the company maintains continuous education programs in the schools surrounding and within the hunting areas. With the aid of school directors and teachers, the company helps conduct lessons that teach the students the importance of wildlife conservation. As explained above, these rural communities rely heavily on company financial and game meat contributions. These lessons help instill in the youth an appreciation and understanding of the wildlife and their habitat. Without hunting companies in these areas these children and families would have no use for the wildlife in the areas and a definite increase in poaching and illegal activity would result.

ADDITIONAL INFORMATION

Sustainable Hunting Management Program

Mr. Brar is very selective when it comes to employing his professional hunters. Only highly experienced professional hunters with a strong ethical and legal approach to hunting are hired. Furthermore, every professional hunter must have a firm knowledge in effective management practices to maintain the longevity of wildlife in the areas. The professional hunters do not take their jobs lightly and understand their role as stewards of wildlife. In the off-season, and when there are breaks in their hunting schedule, the professional hunters offer their expertise and accompany the anti-poaching units.

The company's professional hunters are required to sign a contract that outlines their duties and obligations. The professional hunter contract ensures a sustainable management program by:

- Requiring the professional hunter to know the law and regulations regarding hunting in Tanzania and abide by them;
- Prohibiting the harvest of underweight elephant and hunting an elephant within two kilometers of a National Park boundary;
- Prohibiting the harvest of a male lion under 6 years old;
- Prohibiting the harvest of any immature buffalo;
- Requiring the harvest of only old and mature animals;
- Prohibiting the harvest of any female or pregnant animal; and
- Prohibiting any other illegal or unethical hunting practices.

Violation of the professional hunter contract may result in heavy fines, termination of employment, and referral to the Ministry of Natural Resources and Tourism to revoke their professional hunters license. The companies' sustainable hunting management program supported by their ethical hunting staff enhances prey base species.

To ensure a sustainable off take of prey base species, the company works closely under the advice of its knowledgeable professional hunters with the Ministry of Natural Resources and Tourism to recommend conservative quotas. The company policy is for a minimal off take with selective harvest of only mature males. The low off take is below.

Rungwa Game Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Rungwa Mpera Game Reserve			
2013	Buffalo	20	10
	Eland	4	1
	Hartebeest	8	1
	Hippo	1	0
	Greater Kudu	4	0
	Roan	5	2
	Sable	5	3
	Zebra	10	7
2014	Buffalo	30	11
	Eland	6	1
	Hartebeest	11	3
	Hippo	1	0
	Greater Kudu	7	2
	Roan	7	3
	Sable	7	5
	Zebra	16	7
2015	Buffalo	10	9
	Eland	4	3
	Hartebeest	6	3

	Hippo	1	0
	Greater Kudu	4	2
	Roan	3	2
	Sable	4	2
	Zebra	8	3
Kizigo West Game Reserve			
2014	Buffalo	20	8
	Eland	4	1
	Hartebeest	10	6
	Greater Kudu	4	2
	Roan	5	1
	Sable	5	3
	Zebra	10	6
2015	Buffalo	5	3
	Eland	2	1
	Hartebeest	4	1
	Greater Kudu	2	0
	Roan	2	1
	Sable	2	1
	Zebra	4	0
Selous Game Reserve K1			
2014	Buffalo	15	5
	Eland	2	1
	Hartebeest	10	5
	Hippo	5	2
	Sable	3	1
	Waterbuck	6	2
	Wildebeest	8	1
	Zebra	10	1
2015	Buffalo	10	5
	Eland	1	0
	Hartebeest	4	3
	Hippo	1	0
	Sable	0	0
	Waterbuck	1	0
	Wildebeest	2	1
	Zebra	3	2

Tanzania Bundu Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Lokisale Game Controlled Area			
2013	Buffalo	30	15
	Eland	7	3

	Hartebeest	15	7
	Greater Kudu	4	1
	Lesser Kudu	7	5
	Oryx	7	5
	Wildebeest	15	11
	Zebra	20	16
2014	Buffalo	35	25
	Eland	7	4
	Hartebeest	15	11
	Greater Kudu	5	4
	Lesser Kudu	7	6
	Oryx	8	6
	Wildebeest	20	11
	Zebra	30	17
2015	Buffalo	8	6
	Eland	4	1
	Hartebeest	6	4
	Greater Kudu	4	2
	Lesser Kudu	3	1
	Oryx	4	2
	Wildebeest	10	5
	Zebra	8	4
Masai Open Area West			
2013	Buffalo	30	17
	Eland	8	2
	Hartebeest	15	8
	Greater Kudu	5	3
	Lesser Kudu	7	4
	Oryx	7	5
	Wildebeest	15	10
	Zebra	20	13
2014	Buffalo	35	23
	Eland	8	5
	Hartebeest	15	9
	Greater Kudu	6	5
	Lesser Kudu	7	5
	Oryx	7	5
	Wildebeest	20	9
	Zebra	25	16
2015	Buffalo	25	20
	Eland	5	1
	Hartebeest	10	6
	Greater Kudu	5	2

	Lesser Kudu	3	2
	Oryx	5	3
	Wildebeest	15	8
	Zebra	15	6
Mkungunero Game Reserve			
2013	Buffalo	1	1
	Eland	1	0
	Hartebeest	1	0
	Greater Kudu	1	0
	Lesser Kudu	1	1
	Oryx	7	0
	Wildebeest	1	0
	Zebra	1	1
2014	Buffalo	8	8
	Eland	3	0
	Hartebeest	5	2
	Greater Kudu	2	2
	Lesser Kudu	4	3
	Oryx	2	1
	Wildebeest	5	1
	Zebra	1	0
2015	Buffalo	3	3
	Eland	1	0
	Hartebeest	3	0
	Greater Kudu	1	1
	Lesser Kudu	2	1
	Oryx	1	1
	Wildebeest	3	1
	Zebra	3	2

Sustainable Lion Hunting Management Program

The company has in place several measures to ensure the sustainable off take of lion in each hunting area. The professional hunter contract requires proper selection of hunted lion. Under no circumstances may a male lion under 6 years old be harvested. Doing so results in a fine of \$20,000 along with the government fines. It is also absolutely prohibited for any lioness to be hunted and no male lion in a pride may be harvested.

Male lion are known to leave their pride to patrol their range. So that a pride male lion is not harvested, the company maintains a lion record. Professional hunters are provided with trail cameras. Trail camera pictures are compiled and entered into the record and the professional

hunters use this record when evaluating huntable lion to avoid underage and pride males. The company's limited off take illustrates their careful selection. Mr. Brar and the professional hunters are confident that each area can sustain the yearly lion off take due to continuous record keeping, lion density, size of the areas, and strong prey base population.

Rungwa Game Safaris Lion Off Take 2013- 2015		
Year	Lion Quota	Lion Off Take
Rungwa Mpera Game Reserve-2,064 Square Kilometers		
2013	4	2
2014	3	1
2015	3	1
AREA TOTAL	10	4
Kizigo West Game Reserve-1,288 Square Kilometers		
2014	3	0
2015	3	2
AREA TOTAL	6	2
Selous Game Reserve K1-332 Square Kilometers		
2014	1	0
2015	1	0
AREA TOTAL	3	0
GRAND TOTAL	22	6

Tanzania Bundu Safaris Lion Off Take 2013- 2015		
Year	Lion Quota	Lion Off Take
Lokisale Game Controlled Area-1,082 Square Kilometers		
2013	4	0
2014	2	0
2015	1	0
AREA TOTAL	7	0
Masai Open Area West-985 Square Kilometers		
2013	4	0
2014	2	0
2015	2	0
AREA TOTAL	8	0
Mkungunero Game Reserve-767 Square Kilometers		
2013	0	0
2014	2	0
2015	1	0
AREA TOTAL	3	0
GRAND TOTAL	18	0

Human Lion Deterrent Agreements

Cattle are an easy source of food for lion in the Masailand areas. Many Masai view lion as a threat to their cattle. However, in order to prevent retaliatory killings against lion, the company has established a system of compensating the Masai for any lost cattle to lion. Since 2010, a total of \$7,500 has been paid directly to herdsman for lost cattle. This compensation system has proven effective at deterring retaliatory killings.

American Hunters

The charts below demonstrate the large role that American hunters play in the company's clientele base as well as the sharp decline in American clients:

Table 1: Rungwa Game Safaris American Hunters 2013- 2015

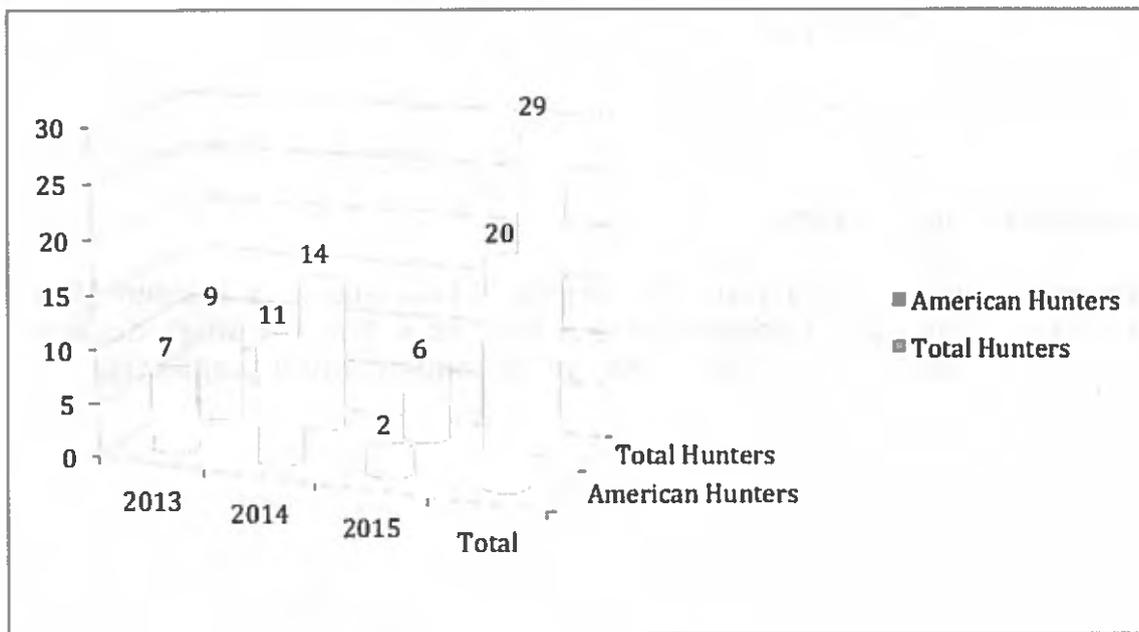
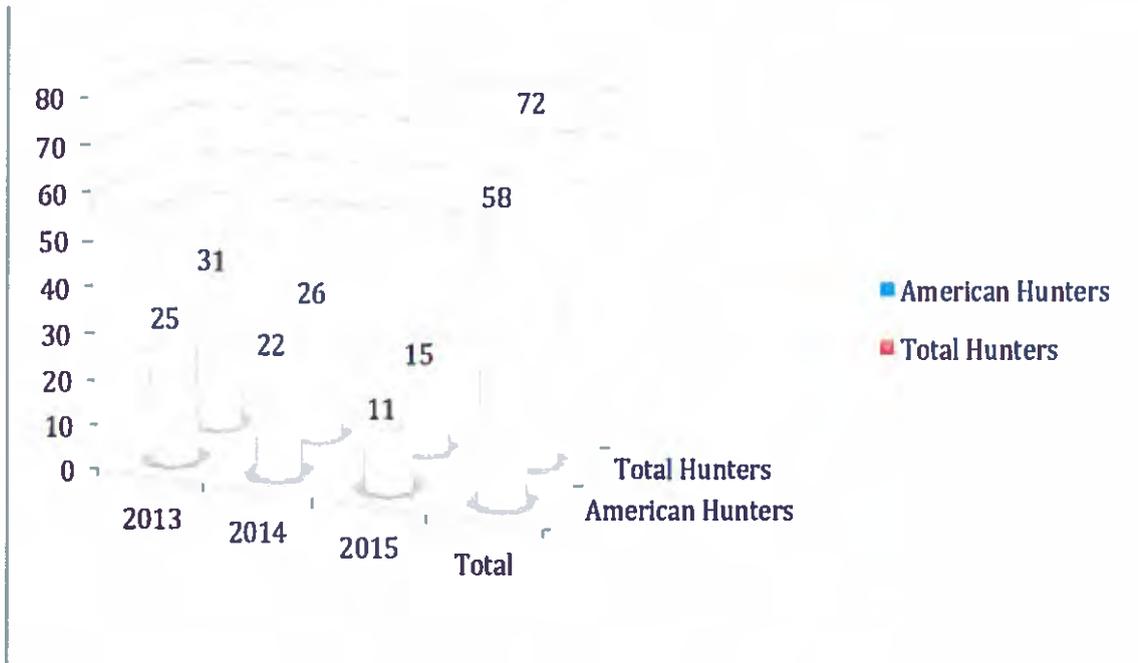


Table 2: Tanzania Bundu Safaris American Hunters 2013- 2015



American Lion Hunters

The below charts demonstrate the large role that American hunters play in the company's lion hunting clientele base as well as the sharp decline in American clients as a result of the threat and eventual lion listing:

Table 3: Rungwa Game Safaris American Lion Hunters 2013- 2015

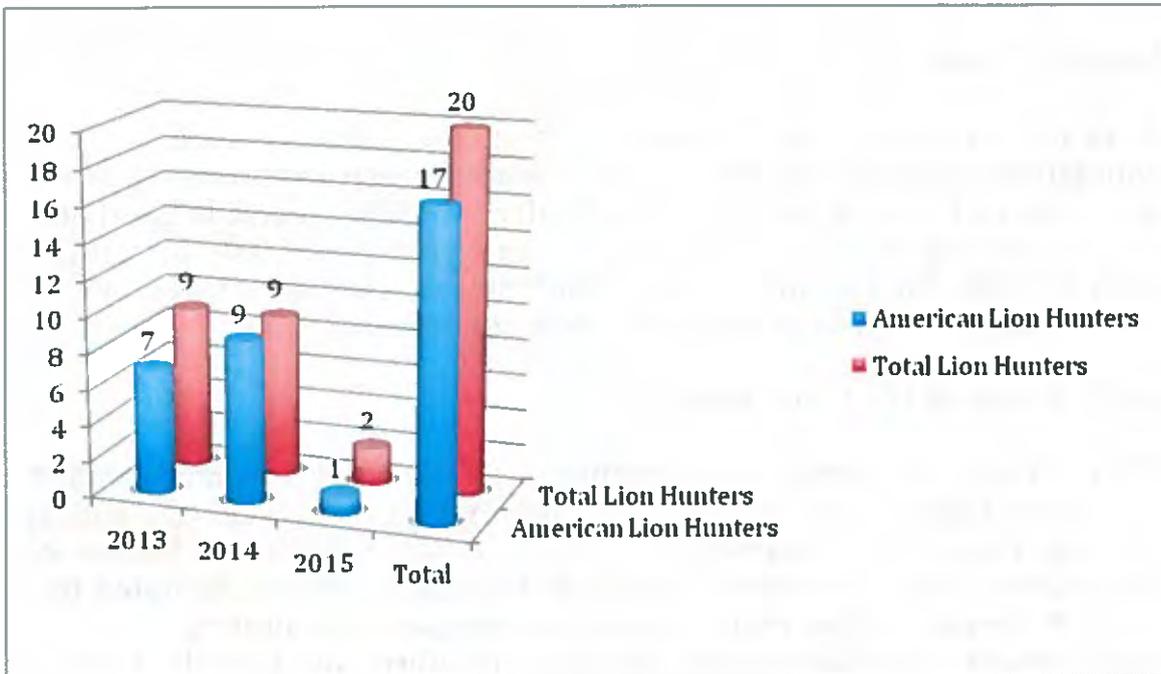
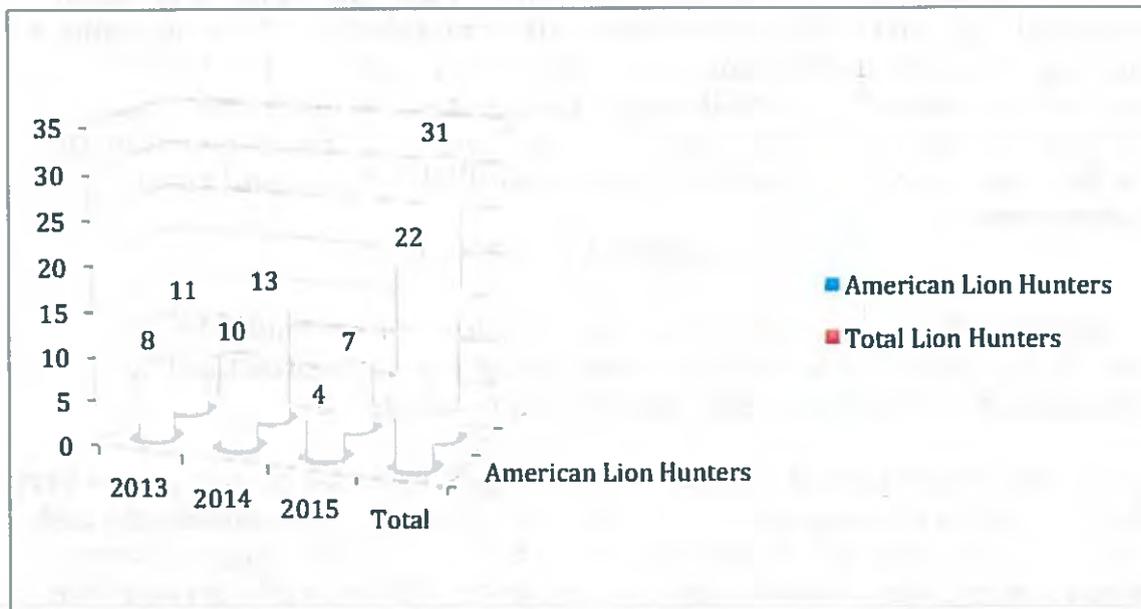


Table 4: Tanzania Bundu Safaris American Lion Hunters 2013- 2015



Exported Lion

Since 2013, six male lion were successfully harvested. The company is proud to report that all lion harvested in 2013 and 2014 were exported in

compliance with Tanzanian law and regulations. The company is still awaiting the aging results of the lion harvested in 2015, but expects they will comply.

Leopard Status

All of the company's hunting areas are home to healthy leopard populations. Leopard are easily able to adapt to their environment and seek various forms of prey. Even in the dry Masailand areas, leopard are found in strong numbers. The compensation agreement with the Masai for lost cattle due to lion is in place for lost goat and sheep taken by leopard, which reduces the risk of retaliatory killings.

Implications of the Lion Listing

After a financially burdensome hunting season in 2015, Mr. Brar decided to transfer Selous Game Reserve K1 to another reputable and upstanding hunting company. Mr. Brar refuses to sacrifice the wildlife and habitat in his hunting areas. Therefore, due to the decrease in safaris, he opted to transfer the area rather than cut anti-poaching and community development contributions. The decrease in safaris was a result of the fear American hunters felt towards a potential regulation on the importation of lion. This fear came to fruition at the end of 2015 with the lion listing. As a consequence of the listing, three lion hunts have been cancelled and currently no lion hunts are scheduled for 2016. Running a hunting company in Tanzania is a very costly endeavor. The loss of revenue because of the lion listing is damaging not only to Mr. Brar's companies, but all hunting companies in Tanzania. The true victims of the lion listing are Tanzania's precious wildlife, habitat, and rural communities.

CONCLUSION

Company policy and practice provides for lion enhancement by specifically addressing the three main threats to lion: prey base degradation, habitat loss, and human lion conflict.

The professional hunter contract requires professional hunters to be very selective when hunting prey base specie such as buffalo, wildebeest and zebra. Only mature males may be hunted. The lion prey base is further supported by the company practice of creating biologically responsible quotas and off take based on the density of each specie in the hunting area. Furthermore, the anti-poaching units are making huge strides in their fight against poaching and serve as a serious deterrent to poaching. By drilling boreholes exclusively for the wildlife, a great deal of pressure is taken off species such as buffalo in their search of water. The

classroom education programs regarding hunting as a conservation tool teaches the students the negative impacts that poaching plays and how hunting plays a beneficial role in their daily lives. Lastly, the continuous game meat contributions serve as an active deterrent to meat poaching. The prey base species in the hunting areas continue to flourish and increase in number.

The company provides for the protection of habitat and reduces habitat loss. The anti-poaching teams treat timber poaching and illegal charcoal burning just as seriously as meat poaching. The units have had great success in seizing illegal timber and illegal timber contraband as well as destroying charcoal burning kilns. The boreholes also serve as tools for habitat protection as they have taken a great deal of pressure off the natural springs and waterholes.

Mr. Brar has specifically addressed the threat of human lion conflict by establishing agreements in the Masailand areas whereby cattle killed by lion are reimbursed their full market value. These agreements have been very effective at handling potential human lion conflict.

APPENDIX

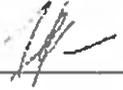
Rungwa Game Safaris and Tanzania Bundu Safaris		
No.	Title	Remark
1	Rungwa Game Safaris and Tanzania Bundu Safaris map of hunting areas	
2	Rungwa Game Safaris "Performance Evaluation" letter	From Ministry of Natural Resources and Tourism
3	Rungwa Game Safaris cover letter for 2013-2015 "Performance Evaluation" report	Sent to Director of Wildlife
4	Rungwa Game Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
5	Rungwa Game Safaris cover letter for 2014 performance update	Sent to Director of Wildlife
6	Rungwa Game Safaris cover letter for 2015 performance update	Sent to Director of Wildlife
7	Tanzania Bundu Safaris Performance Evaluation letter	From Ministry of Natural Resources and Tourism
8	Tanzania Bundu Safaris cover letter for 2013-2015 "Performance Evaluation" report	Sent to Director of Wildlife
9	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
10	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
11	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
12	Rungwa Game Safaris Government Anti-Poaching Contributions	2013-2015
13	Rungwa Game Safaris Anti-Poaching Vehicle Repair Expenses	2013-2015
14	Rungwa Game Safaris Anti-Poaching Fuel Expenses	2013-2015
15	Rungwa Game Safaris Anti-Poaching Wages and Food	2013-2015
16	Rungwa Game Safaris Anti-Poaching Reports	
17	Tanzania Bundu Safaris Government Anti-Poaching Contributions	2014 & 2015
18	Tanzania Bundu Safaris Anti-Poaching Vehicle Repair Expenses	2013-2015
19	Tanzania Bundu Safaris Anti-Poaching Vehicle	2013-2015

	Fuel Expenses	
20	Tanzania Bundu Safaris Anti-Poaching Wages and Food Expenses	2013-2015
21	Tanzania Bundu Safaris Anti-Poaching Reports	
22	Anti-Poaching and Illegal Timber Photos	
23	Rungwa Game Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgment	2013-2015
24	Tanzania Bundu Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgement	2013-2015
25	Community Development Photos	
26	Rungwa Game Safaris & Tanzania Bundu Safaris Professional Hunter Contracts	
27	Rungwa Game Safaris Allocated Quota	2013-2015
28	Tanzania Bundu Safaris Allocated Quota	2013-2015
29	Prey Base and Wildlife Photos	From Company Hunting Areas
30	Lion Photos	From Company Hunting Areas
31	"Custodians of Wilderness" Film	On file with United States Fish and Wildlife Service

Name: Harpreet Brar

Position Held: Owner and Managing Director

Company Names: Rungwa Game Safaris & Tanzania Bundu Safaris

Signature:  _____

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US Fish & Wildlife Service

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(b) (6)



Permit Number: MA25027C-0
Effective: 09/01/2017 Expires: 08/31/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803



CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHRISTOPHER (b) (6) MANION
(b) (6)
ANCHORAGE, AK (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. Trophy must have been taken during the 2017 hunting season in Kalahari Oryx Private Game Reserve, Northern Cape Province.
- D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2017 season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.
- F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).



Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

MAR - 7 2017 LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Markl	1.b. First name Edward	1.c. Middle name/initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	2. Social Security No. (b) (6)	3. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Decatur	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US198409/9 No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 01/30/2017

Please continue to next page



E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Tanzania Rungwa Game Reserve block Rungwa East
Selous Game Reserve block MHT 3
 - b. Date wildlife is to be hunted:
July 1st to 30th, 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: *Coppersmith Global Logistics is agent.*
 Business Name: *Shipper in Tanzania is*
 Address: *Bushman Hunting Services Limited*
 City: *Plot No. 9-14, Block C, Msamvu Industrial Area*
 State/Province: *P.O. Box 678*
 Country, Postal Code: *Morogoro, Tanzania*

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force and Tanzanian authorities and operators.
CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

~~6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.~~

~~I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.~~

~~Taxidermist/Broker's signature: _____ Date: _____~~

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: *01/30/2017*

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: 

Name: EDWARD (b) (6) MARKL (b) (6)

Date: 30 January 2017

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE



**Plot No. 61-64; Block 'E' Kihonda Industrial Complex,
P. O. Box 678 Morogoro, TANZANIA.
Email: info@bushmanhunting.com
Website: www.bushmanhunting.com**

RE: Operator Enhancement Report

DESCRIPTION OF COMPANY

Bushman Hunting Safaris Limited is a private company established by local Tanzanian hunters in 2009. Talal Abood is the owner and Managing Director of the company. He is a dedicated hunter and conservationist with a strong belief in wildlife and habitat conservation through sustainable hunting practices. Under his direction, the company has grown into one of Tanzania's premier hunting outfitters, providing top quality safaris in the country's prime hunting areas.

The company employs five professional hunters, ten game trackers, fifty-five camp staff, and six administrative personnel. Depending on the hunting area, 10%-15% of the full-time staff are members of neighboring villages. In addition, before and throughout the hunting season the company employs numerous individuals from surrounding villages for various tasks and projects. To further engage local communities, various community development and educational programs have been established for neighboring villages.

In conjunction with company professional hunters, area managers, and government project managers, each area has an anti-poaching program.

In August of 2015, Bushman Hunting Safaris Limited received a letter from the Ministry of Natural Resources and Tourism commending its outstanding performance as a hunting outfitter. The criteria for the performance letter was the utilization of allocated quotas, payment of government levies, compliance with hunting laws and regulations, anti-poaching efforts, and community assistance.

By maintaining the current high performance, the company is pre-qualified for renewal of the currently allocated hunting areas.

DESCRIPTION OF CONCESSIONS

In 2013, the Ministry of Natural Resources and Tourism allocated three blocks to the company for the 2013-2018 term: Rungwa Rungwa East Game Reserve, Maswa Game Reserve North, and Selous Game Reserve MHJ3. Each area offers a diverse topography, array of species, and quality hunting experience for clients.

Rungwa Rungwa East Game Reserve

The Rungwa Rungwa East Game Reserve borders the Ruaha National Park to the North. The hunting block is 1,370 square kilometers with a well established road network throughout. The area boasts a dense lion population as well as countless herds of buffalo. It is not uncommon to have over 20 different male lion on bait during the period of lion safaris. Species such as leopard, elephant, eland, sable, roan, zebra, greater kudu, reedbuck, bushbuck, klipspringer, bush pig, warthog, hyena, elephant, hippo, and crocodile are plentiful in the area.

Maswa Game Reserve North

Maswa Game Reserve North is one of the best hunting locations in the world. The area is 751 square kilometers. Bordering the South Western part of the Serengeti it plays a crucial role as a buffer area to poachers and cattle herders. The area acts as a dry season refuge for many animals in the Serengeti. The Maswa area harbors the internationally known wildebeest migration and throughout the year is home to thousands of animals. Common species include Thompsons's Gazelle, wildebeest, zebra, impala, roan, eland, buffalo, topi, elephant, leopard, and lion. The lion population in the area is high due to the abundance of prey base animals and suitable habitat.

Selous Game Reserve Block MHJ3

The Selous Game Reserve is the largest game reserve in the world. The block is 1,147 square kilometers and is located in the South East part of the reserve. It is comprised of rolling savannah woodland, grassland plains, and rocky outcrops. Some of the largest rivers in Tanzania flow through the Selous. The concession

has a high density of prey base species such as hippo, buffalo, eland, and wildebeest supporting a healthy lion population.

GOVERNMENT FEES

From 2013-2015, the company has paid a total of \$1,998,282 in government fees for all three concessions. Government fees are directly correlated to the company's revenue. This sum is comprised of block fees, game fees, hunting permits, gun permits, withholding tax, VAT, PAYE and SDL tax. This amount has assisted the government to meet its development plans particularly in the protection and conservation of wildlife. The large drop in 2015 was a result of a reduced demand for lion safaris by the American hunting market.

Amounts in USD

Particulars for all Three Areas	2013	2014	2015
Block Fees	\$150,000	\$150,000	\$150,000
Game Fees	\$402,800	\$355,518	\$255,080
Hunting Permits	\$167,054	\$140,250	\$110,350
Gun Permits	\$6,120	\$5,760	\$3,022
Business License and Gov't Fees	\$4,462	\$12,050	\$13,105
Withholding Tax	\$7,163	\$5,881	\$4,032
VAT	\$17,357	\$21,356	\$10,100
PAYE and SDL	\$2,055	\$2,160	\$2,607
TOTAL PER YEAR	\$757,011	\$692,975	\$548,296
GRAND TOTAL	\$1,998,282		

ANTI-POACHING COMPONENT

Anti-Poaching Activities

The company uses government anti-poaching scouts in collaboration with its own scouts and staff to form each anti-poaching unit. Anti-poaching units are used and deployed in all three hunting areas. Likewise, the company has engaged three anti-poaching experts who assist anti-poaching units. Each anti-poaching unit is comprised of five to seven individuals. The anti-poaching units patrol the sensitive boundaries of the hunting blocks on foot and by using motorcycles and vehicles. Patrols are conducted multiple times a month for several days at a time.

The anti-poaching units are trained by experienced government scouts as well as by company professional hunters with years of anti-poaching experience. Each unit is equipped with firearms, vehicles, camping equipment, radios, satellite phones, GPS, and cameras provided by the company. The anti-poaching units are making a significant difference in deterring, preventing, and prosecuting poaching. In the off-season, the company maintains financial and ground support to the anti-poaching teams. This enables year-round protection of the wildlife and habitat.

Anti-poaching units are trained to deal with the use of rifles, spears, poison arrows, snares, and trained poaching dogs, fish poaching, timber poaching, and hardwood charcoal burning. All incidents regarding the destruction of wildlife or habitat are taken seriously and fully prosecuted.

The company has established a strong informant network in the villages through a system of compensating cooperative village informants for information leading to an arrest or seizure.

Upon entering the newly allocated concessions in 2013, the company realized the need for a much more advanced and extended road network. Road building crews are sent out months before the start of the hunting season to maintain, rebuild, and extend the road network, which enables the anti-poaching teams to reach all parts of the hunting area.

Anti-Poaching Contributions

Bushman financially supports a collaborative anti-poaching program involving its own staff and government anti-poaching scouts.

In the course of implementing the anti-poaching operations, the company provides a Land Cruiser to each hunting area. The vehicles are used full-time under the administration of the Game Reserve Managers. The company pays for all maintenance and fuel expenses for the vehicles. To reach inaccessible parts of the hunting areas, two motorcycles were donated to the Maswa Game Reserve. In 2015, Bushman rented a helicopter to conduct anti-poaching operations. Using the helicopter allowed for increased surveillance coverage and is surely a method that will be used in the future.

In 2015 the company paid a sum of \$10,000 for the rehabilitation of government anti-poaching camps used by the teams. The company contributed the following equipment to address requests made by government Game Reserve anti-poaching units:

- **Maswa:**
 - 2 Motorcycles worth.....\$3,200
 - 2 Garmin GPS devices worth.....\$1,100
 - 2 HF Radios with complete parts worth.....\$7,000
 - 2 Digital Cameras worth.....\$800
 - 1 Desktop computer worth.....\$1,000
 - 1 Generator.....\$1,200
- **Rungwa:**
 - 2 HF Radios worth.....\$4,400
 - 3 GPS devices worth.....\$1,650
- **Selous:**
 - 20 GPS devices worth.....\$11,000
- **GRAND TOTAL.....\$31,350**

The company's anti-poaching contributions are detailed below along with the results enabled by these contributions that include the arrests of 22 poachers.

Amounts in USD

Amount Spent on Anti-Poaching Activities (2013-2015)				
Particulars	2013	2014	2015	Total
Salaries and Wages	\$13,400	\$13,900	\$14,055	\$41,355
Fuel Expenses and Donations	\$8,265	\$9,006	\$9,723	\$26,994
Anti-Poaching Facilitation Contributions	\$1,500	-	\$1,500	\$3,000
Helicopter Rental Fee	-	-	\$14,500	\$14,500
Road and Air Strip Repair	\$11,000	\$10,500	\$10,500	\$32,000

Rehabilitation of Government Anti-Poaching Camps	-	-	\$10,000	\$10,000
Anti-Poaching Equipment Contributions (see above chart)	-	-	\$31,350	\$31,350
Value Depreciation of Anti-Poaching Vehicles	\$15,000	\$15,000	\$15,000	\$45,000
Anti-Poaching Units General Equipment Resupply	-	-	\$7,320	\$7,320
TOTAL	\$49,165	\$48,406	\$113,948	\$211,519

Results of Anti-Poaching Operations

Bushman Hunting Safaris Anti-Poaching Results 2013-2015	
Item	Quantity Seized
Snares	2,500
Machetes	48
Knives	52
Axes	30
Spear	26
Motorcycles	5
Bicycles	28

Bushman Hunting Safaris Poacher Arrests 2013-2015		
Date of Arrest	Case Number	Names of Poachers Arrested
25/5/2013	BAR/RB/1090/2013	John Ngitile
27/06/2013	BAR/RB/888/2013	Ras John
03/07/2013	BAR/RB/1415/2013	Kulwa Limbu, Magulu Kirungu, Keleja Limbu, Mahusi Sirima, and Marco Sindha
29/07/2013	BAR/IR/1639/2013	Charles Kanyege and Msanja Limbu
23/06/2014	IR/948/2014- RB/1446/2014	Gingi Mlyangeni and Matuba Mg'hindhi
16/07/2014	BAR/IR/1085/2014	Buluda Kibinza and Kadole Jitabusu
18/09/2015	BAR/RB/2707/2015	Mabula Malale, Lameck Masuka, and Kulwa Gasisi
23/09/2015	BAR/RB/2739/2015	Isonga Sariko, Sobia Nyara, Malenga Semba, Lusongi Nyedo, and Maduhu Lusongi
TOTAL ARRESTED		22

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROJECTS

Community Education

Bushman Hunting Safaris Limited has sponsored several community educational workshops in the neighboring villages. Government anti-poaching scouts and project managers conduct the workshops. The purpose of the workshops is to educate the villagers regarding the importance of protecting wildlife and their habitat. Specifically, the workshops work to accomplish and educate on the following: the long term dangers and damage of cattle herding in wildlife habitat; the long term dangers and damage of poaching and illegal charcoal

burning; the role hunting plays as a sustainable conservation tool; and maintaining continuous and positive presence in the surrounding villages.

Cattle Herder Operations

The Serengeti National Park and Maswa Game Reserve are among the most important and pristine ecological areas in the world. One large threat facing both is the encroachment of cattle herders into the areas. By law, no person is allowed to enter a game reserve or national park without proper documentation and no cattle under any conditions. But, in the Maswa-Serengeti region, members of the Wasukuma tribe attempt enter the area with a large number of cattle. They have over-cultivated their farmland and largely eliminated their former grazing pastures. The herdsman attempt to graze their cattle in the Reserve and National Park. Due to the location and quality of grass, the herdsman risk heavy fines and impoundment of their cattle.

The Maswa Game Reserve serves as the first line of defense to cattle and human encroachment. The company and government scouts conduct many patrols and constant monitoring year-round to prevent this encroachment. Once the cattle have been located, they are taken to the game post where they are impounded. Only upon payment of the fine will the cattle be released to their owner This habitat protection project has been successful in curbing cattle numbers and preserving the quality of the ecosystem.

Fines in Tanzania Shillings

Year	Number of Cattle Impounded	Number of Cattle Herders Fined	Fines Paid by Cattle Herders
2013*	16,505	55	Tsh 33,510,000/-
2014	19,657	288	Tsh 135,450,000/-
2015**	5,721	108	Tsh 42,000,000/-
2016***	700	7	Tsh 5,800,000/-

*For the months of April, May, and June 2013.

**For the months of January, March, July, August, September, October, November, and December 2015.

***For the months of January, February, and March 2016.

COMMUNITY PARTICIPATION

Community Assistance

Bushman Hunting Safaris Limited is devoted to working hand in hand with the surrounding villages. The company contributes directly to the villages through cash contributions of at least \$20,000 per year. This has helped maintain quality relations between the company and neighboring villages. Furthermore, direct contributions to the villages acts as an incentive to deter poachers and other illegal behavior in fear of losing future contributions.

All contributions are properly documented and monitored. Villages are required to send a letter acknowledging receipt of the contribution as well as an agenda for the use of the funds. Through its contributions, the company is proud to have supported projects such as constructing two medicine dispensaries, constructing multiple classrooms and housing for teachers, repairing village water wells, providing health care insurance, and addressing other various requests to improve the quality of life in the local villages. In addition to direct financial contributions, the company has contributed school and classroom supplies.

Hunting clients independently and voluntarily contribute greatly to the villages as well. Many of them come with duffel bags full of clothes, shoes, school supplies, soccer balls, and medical equipment. Additionally, some clients choose to give money directly to schools in the villages. These donations have introduced thousands of dollars to the impoverished villages.

An accounting of the company's community contributions is below and does not incorporate the additional client contributions.

2013 Community Participation Contributions		
Village	Amount	Purpose
Barikwa	\$5,000	Village development projects
Mwauchumu	\$2,500	Classroom construction
Longalombogo	\$2,500	School rehabilitation
Kinyika	\$2,500	School rehabilitation
Kisanga	\$2,500	School rehabilitation
Makale	\$5,000	Classroom construction
TOTAL	\$20,000	

2014 Community Participation Contributions		
Village	Amount	Purpose
Mwasinasi	\$2,500	Classroom construction
Lung'wu	\$2,500	Medicine dispensary construction
Kikulyungu	\$5,000	Village development projects
Makale	\$2,500	Village development projects
Chinugulu	\$2,500	Village development projects
Maperamengi	\$5,000	Village development projects
TOTAL	\$20,000	

2015 Community Participation Contributions		
Village	Amount	Purpose
Damidami	\$5,000	Classroom construction
Kikulyungu	\$5,000	Reconstruction of water well and health insurance for villagers
Sasilo	\$2,500	Village development projects
Chisingisa	\$2,500	Village development projects
Kinyika	\$2,500	Village development projects
Kisanga	\$2,500	Village development projects
TOTAL	\$20,000	

Game Meat Contributions

Being owned and managed by local Tanzanians, the company recognizes the severe poverty and protein malnutrition experienced by many people living in rural areas. The company has an agreement with the surrounding villages to donate 50% of the game meat harvested throughout the season to them. The agreement both improves nutrition and acts as a deterrent for villagers from meat poaching.

Animal Conflict Control

As per company policy, the company collects reports from villages in respect to problem animals. It is the responsibility of the company's professional hunters

and rangers to keep wildlife out of community farms during harvest periods and address any human or livestock conflicts with lion and other predators. This agreement has been formed due to the company's personal corporate social responsibility practice.

The company has a standing agreement with neighboring communities to compensate them for any livestock lost to lions and other predators. This agreement serves to act as a deterrent to retaliatory lion killing.

In addition, the company conducts regular educational courses in the local communities on how to defend against crop raiding animals. In 2015, the anti-poaching teams received 15 reports of lion and livestock conflict as well as crop raiding animals. The company is proud to report no lions have been killed as a result of retaliation from livestock losses, and the communities have been successful in driving out wild animals without loss of crop, animal injury, or human injury.

OTHER INFORMATION

Hunting Regulations

All of the company's professional hunters are obligated by contract to adhere to Tanzania's Wildlife Regulations or face termination of employment and potential loss of their professional hunters' licenses. The hunting regulations and the company policy support a true fair chase hunt and longevity of the wildlife within the hunting areas.

Company Sustainable Hunting Practices

All company professional hunters are highly trained and experienced. Each professional hunter has over 15 years of professional hunting experience. The professional hunters maintain the highest ethical hunting standards in keeping with the company's own standards. Each professional hunter working for the company must sign a contract with the company that outlines the ethical practices, management program, and the regulatory standards with which they must comply.

Furthermore, a strict management program of only harvesting mature male species supports the longevity and quality of the hunting areas and its wildlife. The company works closely with the Ministry of Natural Resources and Tourism to create a sustainable and conservative quota for each hunting area. The yearly quotas and the company policy of only harvesting mature males ensures the protection of the lion's prey base.

Bushman Hunting Safaris Prey Base Off Take 2013-2015			
Year	Specie	Allocated Quota	Off Take
Rungwa Rungwa East Game Reserve			
2013	Buffalo	30	13
	Eland	7	3
	Hartebeest	18	0
	Hippo	8	4
	Roan	8	2
	Sable	6	1
	Waterbuck	8	2
	Zebra	18	6
2014	Buffalo	30	9
	Eland	7	3
	Hartebeest	18	3
	Hippo	8	3
	Roan	8	1
	Sable	6	1
	Waterbuck	8	0
	Zebra	18	6
2015	Buffalo	30	12
	Eland	4	1
	Hartebeest	6	3
	Hippo	8	3
	Roan	8	1
	Sable	6	0
	Waterbuck	8	3
	Zebra	19	2
Maswa Game Reserve North			
2013	Buffalo	40	39
	Eland	7	3

	Hartebeest	24	6
	Roan	8	7
	Topi	20	18
	Waterbuck	16	9
	Wildebeest	26	14
	Zebra	26	18
2014	Buffalo	40	32
	Eland	12	5
	Hartebeest	24	8
	Roan	10	4
	Topi	26	14
	Waterbuck	13	6
	Wildebeest	26	15
	Zebra	26	17
2015	Buffalo	50	13
	Eland	14	0
	Hartebeest	24	5
	Roan	10	2
	Topi	30	5
	Waterbuck	13	1
	Wildebeest	30	4
	Zebra	30	6
Selous Game Reserve MHJ3			
2013	Buffalo	30	5
	Eland	8	4
	Hartebeest	18	5
	Hippo	8	6
	Sable	4	3
	Waterbuck	8	4
	Wildebeest	15	3
	Zebra	18	5
2014	Buffalo	30	6
	Eland	8	1
	Hartebeest	18	4
	Hippo	8	3
	Sable	5	2

	Waterbuck	8	1
	Wildebeest	15	4
	Zebra	18	3
2015	Buffalo	30	17
	Eland	4	5
	Hartebeest	7	5
	Hippo	8	3
	Sable	5	3
	Waterbuck	8	4
	Wildebeest	15	9
	Zebra	18	8

Company Sustainable Lion Hunting Practices

In accordance with Tanzania's hunting regulations, the company only allows lions six years of age and older to be harvested. In Maswa Game Reserve North, the company has instituted a mandatory age restriction of lion seven years of age and older. The company has implemented this policy as male lion estimated to be six years of age have been seen in prides with cubs. This is a result of the unique Serengeti ecosystem in which these lion live. In addition, the company does not allow for any male lion that is in a pride to be harvested during a hunt. The company's robust lion monitoring program in each area, create the condition that when a lion is harvested, he is of proper age and not in a pride. The company professional hunter contracts include the above lion hunting practices.

Bushman Hunting Safaris Lion Off Take 2013-2015	
Year	Lion Off Take
Rungwa Rungwa East Game Reserve	
2013	3
2014	1
2015	2
AREA TOTAL	6
Maswa Game Reserve North	
2013	4
2014	1
2015	0
AREA TOTAL	5

Selous Game Reserve MHJ3	
2013	1
2014	0
2015	2
AREA TOTAL	3
GRAND TOTAL	14

Lion Monitoring Practice

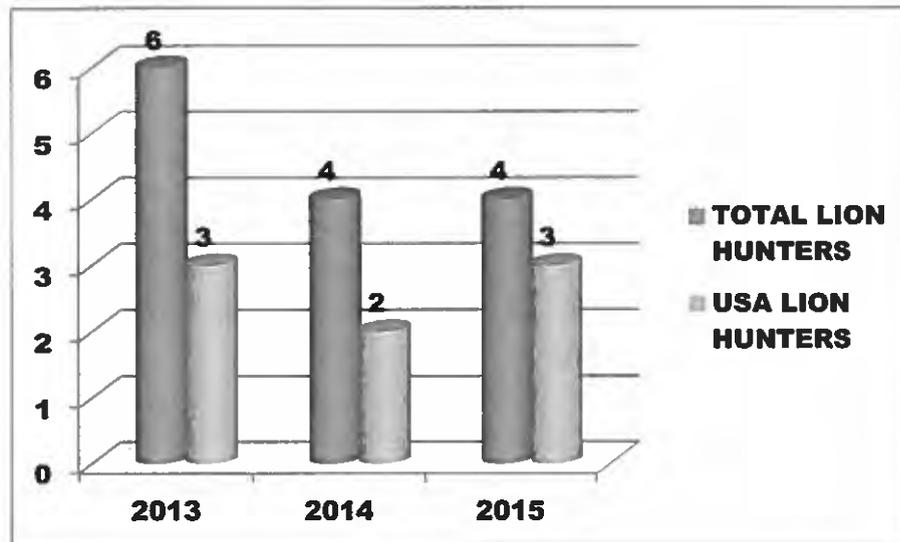
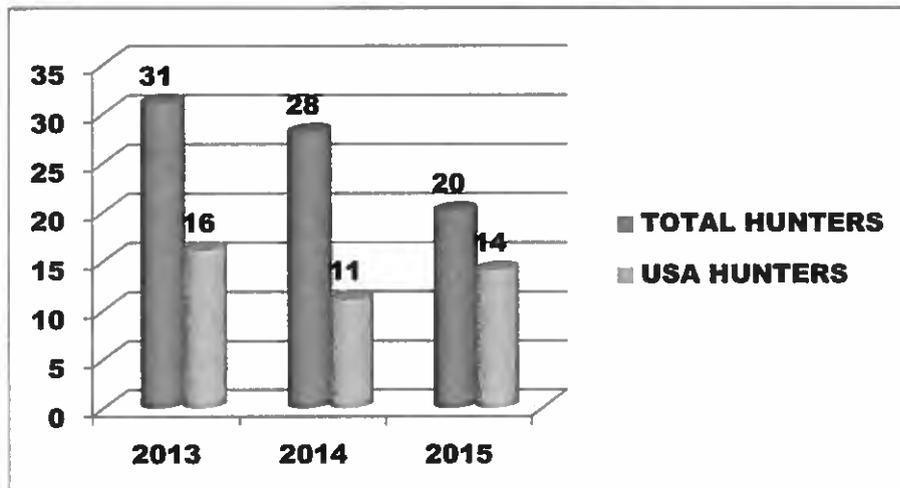
The use of game cameras has enabled the company to monitor, identify, and age lions in its hunting areas. All professional hunters are provided with game cameras and are required to submit pictures for the company database. It has become company policy for outgoing and incoming professional hunters to leave reports on the various lions coming to bait. Furthermore, lion encounters and any baits that have been "hit" by lions are entered into each camp's GPS. Because the professional hunters are familiar with lion in the areas and able to identify them through the photo database, the professional hunters can spot and hunt only non-pride male lions.

Lion Exports

Since 2013, company clients have successfully harvested 14 lion across the three concessions. The lion taken in 2015 have not yet been aged and thus have not yet been exported, but it is expected due to the use of cameras, the professional hunters' skill, and company policy that the 2015 lion will also be exported. However, the company is proud and happy to report that all lions from the 2013 and 2014 hunting season were successfully exported according to Tanzanian law and all applicable hunting regulations.

American Hunting Market

Hunters from the United States make up the majority of Bushman Hunting Safaris' clientele. Furthermore, 50% of the company's lion hunters from 2013-2015 have been Americans. Without the revenue from American lion hunters, the company will lose crucial revenue for anti-poaching and community assistance undertakings.



Elephant Status

Each of the hunting areas boasts a healthy elephant population. Due to the inability to import elephant ivory into the United States, no elephant hunting safaris have been conducted since 2014. This has resulted in a large potential loss of income to the company that would be directed towards anti-poaching and community assistance. All the hunting areas provide year-round access to permanent water and a healthy food source of mango trees, marula trees, and others. Herds made up of cows, calf, and young bulls are frequently seen. Also, mature elephant solitary bulls and bachelor herds are present in all the areas. Since 2013, there have only been two poaching incidents regarding elephant. This is a direct result of the company's continuous anti-poaching activities.

Leopard Status

Leopard are abundant in all the company's hunting areas due to their strong prey base of impala, reedbuck, and bush pig. It is not uncommon during the day to see leopard sleeping and circling their territory in the hunting areas. The company maintains a low leopard off take of an average of three per year in each area. The professional hunters are selective in ensuring only mature male leopard are harvested. Game camera pictures are compiled for leopard as well. Lastly, the same agreements in place for any loss of livestock by lion apply to leopard. For all these reasons, the leopard populations in the areas are believed to be stable and increasing.

CONCLUSION

The sustainable hunting program and practices of Bushman Hunting Safaris Limited are enhancing the survival of the lion. The company's efforts address the greatest threats to lion in Tanzania: human-wildlife conflict, habitat encroachment, and prey base degradation.

The company's programs to curb and address human animal conflict have enhanced the survival of lion by increasing tolerance and appreciation by providing educational workshops in villages on the long-term benefits of wildlife conservation and hunting, that incentivize the protection of lion and other species instead of retaliation or poaching. The company policy of compensating cattle lost to lion is a strong deterrent to retaliatory killings. Lastly, the

company's training programs on a safe and effective approach to deal with crop raiding elephants and other species has been successful in stopping retaliatory killings and has improved the tolerance of local people to the area's increasing wildlife.

Further, by providing funds for community development and contributing 50% of game meat harvested, a strong relationship has been formed between the company and the neighboring villages. The company's multifaceted approaches to community contributions provide a strong financial incentive and knowledge of the long-term benefits of conservation and hunting to the communities.

The company's habitat protection program greatly reduced the encroachment of the cattle herders into the Maswa Game Reserve and neighboring Serengeti National Park. The program safeguards the healthy grass used by prey base animals and helps maintain a strong prey base population within the hunting areas.

In addition to the habitat protection program in place, the continuous monitoring of the hunting areas by the anti-poaching units prevents habitat and prey base losses. Illegal timber poaching and charcoal burning destroys hardwoods that take hundreds of years to grow. The company has arrested numerous timber and charcoal poachers and seized their saws and equipment. Combined, the strict habitat protection program and anti-poaching campaigns against timber and charcoal poachers serve to preserve the habitat for lion species.

Moreover, continuous and year-round anti-poaching patrols protect prey base species such as buffalo, wildebeest, and zebra. The anti-poaching patrols arrest poachers, remove snares, gather information from village informants, and maintain a constant presence in the hunting areas that deter incursion. The company's contribution of funds, equipment, and technology have allowed the anti-poaching units to more effectively curb poaching in the areas.

In sum, the combination of substantial community benefits and community education, habitat protection programs, a strong anti-poaching presence, and a sustainable, legal, and ethical approach to lion hunting reduces human lion conflict, and defends the prey base and habitat. Bushman Hunting Safaris area management provides and will continue to provide lion enhancement.

Name: Talal Abood

Signature:  _____

Position Held: Owner and Managing Director

Operator Name: Bushman Hunting Safaris Limited

APPENDIX

No.	Title	Remarks
1	Map of hunting areas	
2	Performance Evaluation Letter from Ministry of Natural Resources and Tourism	
3	Professional Hunters Contract	
4	Donations to Government Anti-Poaching	2015-2013 in Maswa Game Reserve, Rungwa Rungwa Game Reserve, and Selous Game Reserve
5	Anti-Poaching Fuel Expenses	2015
6	Anti-Poaching Fuel Expenses	2014
7	Anti-Poaching Fuel Expenses	2013
8	Anti-Poaching Reports	2015-2013
9	Habitat Protection Program Results and Letter from Ministry of Natural Resources and Tourism Commending the Company for Efforts Against Cattle Incursion	Impounded cattle and cattle herder fines 2013-2016 for Maswa Game Reserve North
10	Community Assistance Bank Transfers	2013-2015 for Maswa Game Reserve North, Rungwa Rungwa East, and Selous Game Reserve MHJ3
11	Letters of Acknowledgement and Agendas for Use of Funds	2013-2015 for Maswa Game Reserve North, Rungwa Rungwa North, and Selous Game Reserve MHJ3
12	Letter Regarding Conservation Education Program and Bank Transfer	
13	Community Development Pictures	
14	Habitat Protection Program Picture	Illegal timber poaching, illegal charcoal burning, and cattle impoundment
15	Anti-Poaching Pictures	
16	Prey Base Specie and Wildlife Pictures	All from company hunting areas
17	Lion Pictures	All from company hunting areas

(b) (6)

10 February 2017
Date

(b) (6)

Pay To The Order Of 057-005

\$ 100.00

One Hundred and 00/100

Dollars

Security Deposit on Demand



For AFRICA'S WOOD PERMIT

(b) (6)

[Signature]

Hydrex Chain

MAR - 7 2017

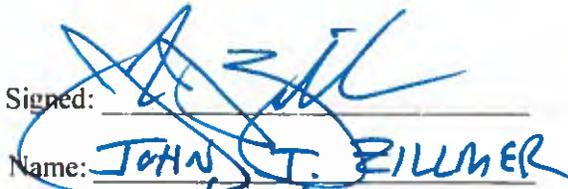
NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import my lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: 

Name: JOHN T. BILLMER

Date: 5/22/2017



Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD JUN 8 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

Section A: Complete if applying as an individual. Fields include: 1.a. Last name (Zillmer), 1.b. First name (John), 1.c. Middle name or initial ((b) (6)), 1.d. Suffix, 2. Date of birth ((b) (6)), 3. Social Security No., 4. Occupation, 5. Affiliation/ Doing business as (N/A), 6.a. Telephone number ((b) (6)), 6.b. Alternate telephone number, 6.c. Fax number, 6.d. E-mail address ((b) (6)).

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution. Fields include: 1.a. Name of business, agency, Tribe, or institution, 1.b. Doing business as (dba), 2. Tax identification no., 3. Description of business, agency, Tribe, or institution, 4.a. Principal officer Last name, 4.b. Principal officer First name, 4.c. Principal officer Middle name/ initial, 4.d. Suffix, 5. Principal officer title, 6. Primary contact name, 7.a. Business telephone number, 7.b. Alternate telephone number, 7.c. Business fax number, 7.d. Business e-mail address.

Section C: All applicants complete address information. Fields include: 1.a. Physical address ((b) (6)), 1.b. City (Glenmoore), 1.c. State (PA), 1.d. Zip code/Postal code ((b) (6)), 1.e. County/Province, 1.f. Country (USA), 2.a. Mailing Address, 2.b. City, 2.c. State, 2.d. Zip code/Postal code, 2.e. County/Province, 2.f. Country.

Section D: All applicants MUST complete. 1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. 2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes [checked] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US84275B/9 No [] 3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 5/26/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (*Appendix I of CITES and/or ESA*)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Tanzania - Lukwati South game reserve
 - b. Date wildlife is to be hunted:
August 15-September 7th, 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:
N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Michel Mantheakis
Business Name: Michel Mantheakis Safaris Ltd
Address: PO Box 384
Address:
City: Dar Es Salaam
State/Province: Tanzania
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

tion provided by Conservation Force and Tanzanian authorities and operators, including findings and responses to CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below);

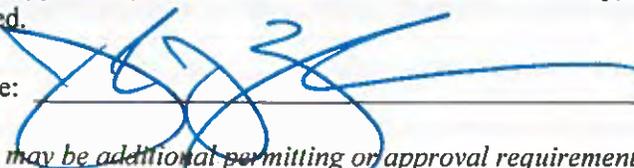
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  _____ Date: 5/26/2017

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.
- If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force
504-837-1233, cf@conservationforce.org
12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?
- Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



MICHEL MANTHEAKIS SAFARIS LTD.

Michel Mantheakis Safaris Ltd.

P.O. Box 354

Dar es Salaam, Tanzania

+255 713 334 770

Email: info@mm-safaris.com

Website: www.mm-safaris.com

Re: Operator Enhancement Report

Company Description

Mr. Michel Mantheakis and his wife Mrs. Nicole Mantheakis founded Michel Mantheakis Safaris in 2010. Mr. Mantheakis was born and raised in Tanzania, and his ancestors came to Tanzania from the Greek island of Crete in 1895. Michel Mantheakis Safaris is a conservation driven hunting company pursuing minimal impact, sustainable, responsible hunting practices, coupled with an extensive community development program. The company maintains continuous anti-poaching and local community participation in order to enhance wildlife and habitat while educating local communities on the importance of wildlife conservation and improving their standard of living.

Mr. Mantheakis has an education in Zoology Wildlife Management and has 31 years of professional hunting experience in Tanzania, Zambia, and Botswana. He has received the prestigious "Professional Hunter of the Year" award from the Houston Safari Club, served as the Secretary General for the Tanzania Professional Hunters Association for eight years, served on the Tanzanian professional hunters examination panel, and represented the Tanzania Professional Hunters Association and Tanzania Hunting Operators Association in five international meetings of the African Wildlife Conservation Forum from 2005-2009. Mr. Mantheakis is regarded as one of Tanzania's most respected professional hunters and hunting operators due to his decades of experience, extreme dedication to wildlife and habitat conservation, and high ethical standards.

Prior to founding Michel Mantheakis Safaris, Mr. Mantheakis was the founder and Managing Director of Miombo Safaris Ltd for 17 year and the Managing Director of Kilombero North Safaris Ltd for 9 years.

Management operations are handled out of the central office in Dar es Salaam, Tanzania. Michel Mantheakis Safaris employs 4 professional hunters, 60 camp staff, 6 administrative personnel, and 15 company anti-poaching scouts. Approximately 50% of the camp staff is comprised of individuals from the neighboring local communities. Moreover, the company hires several dozen additional community members for four to five months of employment for yearly road opening activities.

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE

In 2015, each hunting company was required to submit a three-year report to the Ministry of Natural Resources and Tourism detailing the company’s payment of government fees, quota utilization, anti-poaching efforts, block development efforts, and community development activities. Michel Mantheakis Safaris received a letter from the Minister applauding the company for an “outstanding and commendable performance.” By maintaining the current performance, the company is automatically qualified for renewal of its currently allocated hunting concessions.

Hunting Concessions

Lukwati Game Reserve South

Lukwati Game Reserve South is located in Western Tanzania and shares 40 kilometers with Lake Rukwa. The area is home to a very dense lion population increasing in number every year due to anti-poaching and selective management practices. A strong prey base population of buffalo, eland, hartebeest, kudu, roan, sable, and zebra supports lion in the concession. The area is made up of thick riverine area, dry riverbeds, miombo woodland, and open plains. Lukwati Game Reserve South is 2,056 square kilometers.

Lake Natron Game Controlled Area West & Longido Game Controlled Area

Both of these concessions are located in Northern Tanzania in the region typically referred to as Masailand. The area is made up of pockets of thick “wait a bit” thorn and whistling acacia, large expansive open plains, saline lakes, and large mountains. Lion safaris are not conducted in either area as the company is undertaking efforts to rebuild the lion population. Other species found in the concession are buffalo, hartebeest, lesser kudu, Robert’s gazelle, Grant’s gazelle, Thompson’s gazelle, gerenuk, wildebeest, and zebra. The concessions are home to part of the wildebeest and zebra migration. The company acquired Longido Game Controlled Area in late October of 2015. Lake Natron Game Controlled Area West is 1,767 square kilometers and Longido Game Controlled Area is 600 square kilometers.

The company operates and stewards 4,423 square kilometers of habitat and wildlife.

Government Fees

The company has paid all government fees in a timely fashion in order to continue operations as a hunting company under the Wildlife Conservation Act. The government fees from hunting are used to fund conservation efforts such as government anti-poaching units. Below is a detailed break down of government fees paid per concession and per hunting client. Also indicated is the nationality of each hunting client to exemplify the important role the American hunting market plays for the company and the lion hunting clients in Lukwati Game Reserve South.

Government Fees for Lake Natron Game Controlled Area West 2013					
Client No.	Nationality	Game Fees	Hunting	Gun	Block Fee

			License, Intercompany License, and Conservation Fees	License	
Client 1	Mexico	\$20,850	\$4,650	\$240	
Client 2	Mexico	\$19,600	\$4,650	\$240	
Client 3	Russia	\$15,000	\$5,450	\$240	
Client 4	Russia	\$13,150	\$5,450	\$120	
Client 5	Russia	\$21,640	\$6,250	\$360	
Client 6	USA	\$3,550	\$7,850	\$240	
Client 7	Russia	\$15,050	\$6,250	\$240	
Client 8	USA	\$1,600	\$4,650	\$360	
Client 9	Mexico	\$13,500	\$4,650	\$240	
Client 10 & 11	USA	\$13,348	\$14,500	\$720	
					\$30,000
Totals					
11	USA: 4	\$137,288	\$64,350	\$3,000	\$30,000
Government Fee Grand Total					
\$234,638					

Government Fees for Lukwati Game Reserve South 2013						
Client No.	Nationality	Lion Safari	Game Fees	Hunting License, Intercompany License, and Conservation Fees	Gun Licenses	Block Fee
Client 1	USA		\$12,680	\$4,650	\$240	
Client 2	USA	X	\$24,280	\$8,500	\$360	
Client 3	USA		\$6,850	\$3,100	\$240	
Client 4	Russia		\$16,350	\$9,300	\$600	
Client 5	USA		\$20,700	\$4,650	\$240	
Client 6	USA		\$12,950	\$10,800	\$360	
Client 7 & 8	USA	XX	\$40,043	\$0*	\$0*	
Client 9	Denmark		\$13,270	\$4,650	\$360	
						\$30,000
Totals						
9	USA: 7	3	\$147,123	\$45,650	\$2,400	\$30,000
Government Fee Grand Total						
\$225,173						

*Hunt was conducted in two areas. Licensing fees were calculated with Lake Natron Game Controlled Area West

Government Fees for Lake Natron Game Controlled Area West 2014					
Client No.	Nationality	Game Fees	Hunting License, Intercompany License, and Conservation Fees	Gun License	Block Fee
Client 1	Denmark	\$20,420	\$6,050	\$240	
Client 2	USA	\$1,310	\$5,600	\$240	
Client 3	USA	\$1,400	\$3,700	\$240	
Client 4	USA	\$2,570	\$3,700	\$120	
Client 5	USA	\$19,750	\$9,300	\$240	
Client 6	Mexico	\$17,520	\$7,450	\$240	
Client 7	Mexico	\$8,100	\$6,050	\$240	
Client 8	USA	\$950	\$3,100	\$0	
Client 9	USA	\$450	\$3,100	\$0	
Client 10	USA	\$5,750	\$4,650	\$240	
Client 11	USA	\$3,950	\$6,050	\$240	
Client 12	USA	\$3,240	\$3,100	\$240	
Client 13	USA	\$13,240	\$7,600	\$360	
Client 14	USA	\$15,390	\$6,200	\$360	
Client 15	USA	\$1,550	\$500	\$240	
Client 16	Germany	\$9,660	\$8,850	\$120	
					\$30,000
Totals					
16	USA: 12	\$125,250	\$85,000	\$3,360	\$30,000
Government Fee Grand Total					
\$243,610					

Government Fees for Lukwati Game Reserve South 2014						
Client No.	Nationality	Lion Safari	Game Fees	Hunting License, Intercompany License, and Conservation Fees	Gun Licenses	Block Fee
Client 1 & 2	USA	X	\$39,110	\$9,300	\$600	
Client 3	USA	X	\$12,900	\$6,050	\$240	
Client 4 & 5	Mexico		\$26,710	\$9,850	\$240	
Client 6	USA	X	\$11,550	\$0*	\$0	
Client 7	USA	X	\$11,125	\$0*	\$0	
Client 8 & 9	Netherlands		\$23,290	\$7,750	\$600	

Client 10 & 11	Italy		\$23,120	\$9,300	\$360	
						\$30,000
Totals						
11	USA: 4	4	\$147,805	\$42,250	\$2,040	\$30,000
Government Fees Grand Total						
\$222,095						

*Hunt was conducted in two areas. Licensing fees were calculated with Lake Natron Game Controlled Area West

Government Fees for Lake Natron Game Controlled Area West 2015					
Client No.	Nationality	Game Fees	Hunting License, Intercompany License, and Conservation Fees	Gun License	Block Fee
Client 1	USA	\$23,150	\$22,900	\$240	
Client 2	Mexico	\$27,090	\$10,300	\$360	
Client 3	USA	\$19,580	\$12,700	\$480	
Client 4-9	Lebanon	\$70,470	\$33,700	\$720	
Client 10	USA	\$8,750	\$6,350	\$240	
Client 11	Sweden	\$2,500	\$4,650	\$240	
Client 12	Italy	\$18,690	\$6,050	\$120	
Client 13	USA	\$9,810	\$9,800	\$480	
Client 14	Ukraine	\$3,250	\$3,600	\$120	
Client 15	USA	\$10,440	\$6,250	\$120	
					\$30,000
Totals					
15	USA: 5	\$193,730	\$116,300	\$3,120	\$30,000
Government Fees Grand Total					
\$343,150					

Government Fees for Lukwati Game Reserve South 2015						
Client No.	Nationality	Lion Safari	Game Fees	Hunting License, Intercompany License, and Conservation Fees	Gun Licenses	Block Fee
Client 1 & 2	USA		\$15,640	\$10,300	\$240	
Client 3-6	USA		\$46,790	\$23,300	\$1,080	
Client 7	USA	X	\$15,460	\$4,650	\$240	
Client 8	USA		\$9,710	\$4,650	\$240	

Client 9-11	USA		\$9,500	\$10,300	\$480	
Client 12 & 13	USA	XX	\$24,000	\$9,300	\$720	
Client 14	USA	3	\$22,720	\$4,650	\$240	
						\$30,000
Totals						
14	USA: 14	3	\$143,820	\$67,150	\$3,240	\$30,000
Government Fees Grand Total						
\$244,210						

Total Government Fees	
Government Fee Particular	Cost
Government Fees for Lake Natron Game Controlled Area West 2013-2015	\$821,398
Government Fees for Lukwati Game Reserve South 2013-2015	\$691,478
Grand Total	\$1,512,876

Anti-Poaching

Anti-Poaching Approach & Expenses

Throughout his career as a hunting operator, Mr. Mantheakis has made anti-poaching a main focus of his conservation program in the hunting concessions. The company deploys its own anti-poaching units year-round. Only government game scouts have the ability to arrest poachers, therefore at least one government game scout accompanies every company anti-poaching unit. Each company anti-poaching unit is usually comprised of six to eight individuals.

The company approach to anti-poaching has had a very beneficial financial and educational impact on the villages. Eight village members are hired each year to assist in anti-poaching efforts. Upon being employed by the company, the village members receive important training from government game scouts, company management, and the professional hunters. This unique form of employment offers income to village members otherwise unavailable without hunting in the concession and the valuable revenue from hunting. Moreover, by having village members directly involved in anti-poaching efforts they are able to witness firsthand the value wildlife conservation has. The village anti-poaching members see the harsh reality poachers face when they are arrested. This important form of education is then passed on to the rest of the village.

Poaching in the hunting concessions vary greatly and require customized responses. The company has encountered bush meat poaching, fish poaching, timber poaching, and illegal charcoal burning. Each form of poaching threatens wildlife and habitat and the company anti-poaching units treat all forms of poaching seriously. The company provides the anti-poaching units with customized anti-poaching vehicles, satellite phones, HF

radios, fuel, tents, uniforms, food, salaries, and other necessary equipment. The company also donates fuel and equipment to government anti-poaching units.

In 2014 in Lukwati Game Reserve South, the anti-poaching units noticed an increased rate of poachers' entrance from Lake Rukwa. The company has a 40-kilometer boundary with Lake Rukwa, thus providing a large entry point for bush meat poachers and fish poachers. In order to combat this, two small boats were purchased and equipped with outboard engines. The two boats patrol the 40-kilometer boundary 365 days a year seeking out any indication of poachers' entry and poaching.

Upon being allocated Lake Natron Game Controlled West, the company became aware the area had been subject to occurrences of commercial zebra skin and bush meat poaching. The company immediately addressed the threat by deploying continuous anti-poaching operations in the concession. Instances of commercial poaching have been eliminated. The few instances of poaching in the concession now involve timber poaching and illegal charcoal making.

In an effort to keep the anti-poaching units continuously motivated, a reward system has been implemented. Members of the company anti-poaching units receive rewards for seizures of poaching contraband and poacher arrests. Furthermore, the company involves the villages in its efforts against poaching by offering rewards for any information leading to the seizure of poaching contraband or poacher arrests. This method has incentivized the villages in cooperating with the company anti-poaching units and acts as a deterrent to poaching.

As a result of the extensive anti-poaching efforts in the hunting concessions, the company has observed a definite decrease in poaching instances. The company has implemented a similar anti-poaching approach in the newly acquired Longido Game Controlled Area. The efforts of the anti-poaching units result in a higher density of prey base species supporting lion. Furthermore, the anti-poaching units protect the habitat used by all forms of wildlife. A detailed breakdown of anti-poaching expenses are below.

Anti-Poaching Expenses for Lake Natron Game Controlled Area West 2013-2015							
Anti-Poaching Particular	No. of People	No. of Days	Quantity	Unit	Price per Unit	Total in Tanzania Shillings	Total in US Dollars
2013							
Diesel	–	180	1800	liters	Tsh 2,207/-	Tsh 3,972,600/-	\$2,452
Kerosene	–	–	90	liters	Tsh 2,144/-	Tsh 192,960/-	\$119
Rewards and Incentives	–	–	–	Tsh	–	Tsh 4,200,000/-	\$2,593
Casual Labor Wages	3	180	540	Tsh	Tsh 5,000/-	Tsh 2,700,000/-	\$1,667
Staff Salaries	2	180	360	Tsh	Tsh	Tsh	\$1,667

					7,500/-	2,700,000/-	
Food Rations	7	180	1260	Tsh	Tsh 2,000/-	Tsh 2,520,000/-	\$1,556
Administrative Fees	1	180	180	Tsh	Tsh 10,000/-	Tsh 1,800,000/-	\$1,111
Government Game Scout Allowances	2	180	360	Tsh	Tsh 20,000/-	Tsh 7,200,000/-	\$4,444
2013 Total	Tsh 25,285,560/- \$15,608						
2014							
Diesel	-	365	7,200	liters	Tsh 1,871/-	Tsh 13,471,200/-	\$8,214
Kerosene	-	365		liters	Tsh 1,803/-	Tsh 162,270/-	\$99
Rewards and Incentives	-	-	-	Tsh	-	Tsh 4,850,000/-	\$2,957
Casual Labor Wages	3	365	1,095	Tsh	Tsh 5,000/-	Tsh 5,475,000/-	\$3,338
Staff Salaries	2	365	730	Tsh	Tsh 7,500/-	Tsh 5,475,000/-	\$3,338
Food Rations	7	365	2,555	Tsh	Tsh 2,200/-	Tsh 5,621,000/-	\$3,427
Administrative Fees	1	365	365	Tsh	Tsh 10,000/-	Tsh 3,650,000/-	\$2,226
Government Game Scout Allowances	2	365	730	Tsh	Tsh 20,0000/-	Tsh 14,600,000/-	\$8,902
2014 Total	Tsh 53,304,470/- \$32,503						
2015							
Diesel	-	365	7,200	liters	Tsh 1,871/-	Tsh 13,471,200/-	\$6,354
Kerosene	-	365	90	liters	Tsh 1,803/-	Tsh 162,270/-	\$77
Rewards and Incentives	-	-	-	Tsh	-	Tsh 5,200,000/-	\$2,453
Casual Labor Wages	3	365	1,095	Tsh	Tsh 5,000/-	Tsh 5,475,000/-	\$2,583
Staff Salaries	2	365	730	Tsh	Tsh 9,500/-	Tsh 6,935,000/-	\$3,271
Food Rations	7	365	730	Tsh	Tsh 2,350/-	Tsh 6,004,250/-	\$2,832
Administrative Fees	1	365	365	Tsh	Tsh 10,000/-	Tsh 3,650,000/-	\$1,722
Government	2	365	730	Tsh	Tsh	Tsh	\$6,887

Game Scout Allowances					20,000/-	14,600,000/-	
2015 Total	Tsh 55,497,720/- \$26,178						
Grand Total	Tsh 134,087,750/- \$74,289						

Anti-Poaching Expenses for Lukwati Game Reserve South 2013-2015							
Anti-Poaching Particular	No. of People	No. of Days	Quantity	Unit	Price per Unit	Total in Tanzania Shillings	Total in US Dollars
2013							
Diesel	-	-	600	liters	Tsh 2,247/-	Tsh 1,348,200/-	\$832
Kerosene	-	-	250	liters	Tsh 2,164/-	Tsh 541,000/-	\$334
Rewards and Incentives	-	-	-	Tsh	-	Tsh 5,800,000/-	\$3,580
Casual Labor Wages	5	274	1,370	Tsh	Tsh 4,000/-	Tsh 5,480,000/-	\$3,383
Staff Salaries	2	274	548	Tsh	Tsh 7,500/-	Tsh 4,110,000/-	\$2,537
Food Rations	7	274	2,000	Tsh	Tsh 2,000/-	Tsh 4,000,000/-	\$2,469
Administrative Fees	1	274	274	Tsh	Tsh 10,000/-	Tsh 2,740,000/-	\$1,691
Government Game Scout Allowances	1	274	274	Tsh	Tsh 25,000/-	Tsh 6,850,000/-	\$4,228
2013 Total	Tsh 32,569,200/- \$20,104						
2014							
Diesel	-	365	600	liters	Tsh 2,188/-	Tsh 1,312,800/-	\$800
Kerosene	-	-	250	liters	Tsh 2,137/-	Tsh 534,250/-	\$326
Petrol	-	182	300	liters	Tsh 2,277/-	Tsh 683,100/-	\$417
Boat Engine Oil	-	182	72	liters	Tsh 9,300/-	Tsh 669,600/-	\$408
Rewards and Incentives	-	-	-	Tsh	-	Tsh 5,300,000/-	\$3,232
Casual Labor Wages	5	365	1,825	Tsh	Tsh 5,000/-	Tsh 9,125,000/-	\$5,564
Staff Salaries	4	365	1,460	Tsh	Tsh 7,500/-	Tsh 10,950,000/-	\$6,677

Food Rations	12	365	2,000	Tsh	Tsh 2,200/-	Tsh 4,400,000/-	\$2,683
Administrative Fees	1	365	365	Tsh	Tsh 10,000/-	Tsh 3,650,000/-	\$2,226
Government Game Scout Allowances	2	365	730	Tsh	Tsh 12,500/-	Tsh 9,125,000/-	\$5,564
2014 Total	Tsh 45,749,750/- \$27,896						
2015							
Diesel	-	365	7,200	liters	Tsh 1,903/-	Tsh 13,701,600/-	\$6,463
Kerosene	-	-	250	liters	Tsh 1,845/-	Tsh 461,250/-	\$218
Petrol	-	365	3,600	liters	Tsh 2,033/-	Tsh 7,318,800/-	\$3,452
Boat Engine Oil	-	182	72	liters	Tsh 9,500/-	Tsh 684,000/-	\$323
Rewards and Incentives				Tsh	Tsh 1,903/-	Tsh 6,500,000/-	\$3,066
Casual Labor Wages	5	365	1,825	Tsh	Tsh 5,000/-	Tsh 9,125,000/-	\$4,304
Staff Salaries	4	365	1,460	Tsh	Tsh 7,500/-	Tsh 10,950,000/-	\$5,165
Food Rations	11	365	2,000	Tsh	Tsh 2,350/-	Tsh 4,700,000/-	\$2,217
Administrative Fees	1	365	365	Tsh	Tsh 10,000/-	Tsh 3,650,000/-	\$1,722
Government Game Scout Allowances	2	365	730	Tsh	Tsh 12,500/-	Tsh 9,125,000/-	\$4,304
2015 Total	Tsh 66,214,650/- \$31,234						
Grand Total	Tsh 144,533,600/- \$79,234						

Additional Company Anti-Poaching Capital Expenses and Contributions to Government Anti-Poaching Units 2013-2015		
Anti-Poaching Particular	Remarks	Cost
2013		
Vehicle Maintenance, Vehicle Depreciation, and Vehicle Spare Parts	-	\$6,600
Custom Anti-Poaching Vehicle	Uri 4x4 vehicle with all necessary upgrades (fittings, pipework, HF	\$44,500

	radio, etc.)	
Tents	4 tents x \$300 2 tents x \$400 1 tent x \$1,200	\$3,200
Two Solar Power Electricity Kids for Anti-Poaching Units	-	\$340
2013 Total		\$69,610
2014		
Vehicle Maintenance, Vehicle Depreciation, and Vehicle Spare Parts	-	\$7,400
Diesel Contribution for Government Anti-Poaching Units	850 liters x Tsh 2,188/- (exchange rate of \$1/Tsh1,640/-)	\$1,134
2014 Total		\$8,534
2015		
Vehicle Maintenance, Vehicle Depreciation, and Vehicle Spare Parts	-	\$8,500
Diesel Contribution for Government Anti-Poaching Units	850 liters x Tsh 1,903/- (exchange rate of \$1/Tsh 2,118/-)	\$1,629
HF Radios Contribution to Wildlife Department		\$1,200
Radio Repairs for Lukwati Game Reserve Game Post		\$300
2015 Total		\$11,629
Grand Total		\$89,773

Grand Total of Anti-Poaching Expenses for Michel Mantheakis Safaris 2013-2015	
Anti-Poaching Particular	Cost
Anti-Poaching Total for Lake Natron Game Controlled Area West	\$74,289
Anti-Poaching Total for Lukwati Game Reserve South	\$79,234
Additional Company Anti-Poaching Capital Expenses and Contribution to Government Anti-Poaching Units	\$89,773
Anti-Poaching Grand Total	\$243,296

Habitat Protection

Timber poaching, illegal charcoal burning, and illegal cattle incursion are the threats to habitat faced in the hunting concessions. In early 2014, a large-scale illegal attempt was

made by five cattle settlements to enter and stay in the Lukwati concession. Due to the swift response, no more instances of cattle incursions have occurred. In that instance, 500 cattle were seized and fined Tsh 30,000/- per head. This habitat protection operation was a complete success. However, instances of habitat related threats have decreased as a result of continuous anti-poaching.

The company has drilled two boreholes for the Masai in the Lake Natron concession. The Masai have exclusive use of the boreholes to water their cattle. The purpose is to ease the pressure and competition for natural springs and waterholes for the wildlife in the concession. Furthermore, herdsman have to travel less in search of water thus decreasing soil erosion.

Anti-Poaching Results

Since 2013, the anti-poaching units in Lake Natron Game Controlled Area West have made the following achievements against poaching: arrested 6 game meat poachers; confiscated several bows, arrows, and spears; confiscated one chainsaw; and confiscated approximately 60 bags of charcoal. The Lukwati Game Reserve South anti-poaching units accomplished the following: found and destroyed 5 poacher camps; removed and fined 800 illegal fisherman; found and destroyed 16 illegal fishing settlements along the Lake Rukwa shoreline; seized dried buffalo meat in a poacher's home with the help of a village informant; confiscated 7 firearms; confiscated 1 boat and illegal hippo meat; arrested 12 timber poachers, confiscated 101 timber planks and various bags of charcoal; arrested 5 illegal honey poachers; removed 5 illegal cattle settlements; and confiscated various machetes, knives, and axes.

As demonstrated, anti-poaching units are successful in protecting prey base species and habitat.

Community Development

Community Development Activities & Expenses

Mr. Mantheakis is third generation Tanzanian and well aware of the difficult conditions Tanzanians living in rural parts of the country experience. The company undertakes extensive community development activities as part of its corporate social responsibility. Community development activities serve two purposes. The first purpose is to improve the standard of living of fellow Tanzanians living in truly dire conditions. Second, to provide a system of incentives whereby villages benefit from sustainable hunting practices and wildlife conservation.

Each hunting company in Tanzania has a mandatory \$5,000 community development fee per concession. Since 2013 in Lake Natron Game Controlled Area West and Lukwati Game Reserve South, the company has spent \$124,803 on community development activities in the two concessions. These expenses far exceed the minimum statutory community development fees. All community development activities are provided

directly to the village by company management without any third party or government intermediary.

The company is extremely proud of the direct positive impact it has made on the lives of thousands of impoverished villagers. Of the most notable are school fees for dozens of children to attend higher education, contributions towards the construction of the Longido Secondary School, contribution towards construction of the Flamingo Secondary School, construction of a medical clinics in both Somee and Gua villages, covering all fees for annual village meetings, drilling two boreholes, and paying for and transporting water to villages during a drought.

These benefits imparted on the communities serve to provide an improved standard of living otherwise not possible without the presence of hunting in the vicinity of their respective villages. Undertaking extensive community development activities in the hunting concessions provides the villages with a financial interest in the concession. It dispenses away with a short-term benefit experienced by villagers partaking in poaching and replaces it with a long-term future of benefits for the entire village.

Community Development Expenses for Lake Natron Game Controlled Area West 2013-2015		
Community Development Particular	Remarks	Cost
2013		
Village Contributions	Tsh 2,600,000 x 7 villages	\$13,086
Borehole Drilling	2 boreholes reaching 200 meters	\$12,000
School Fees for Children Higher Education	3 children per village x 7 villages	\$2,593
Merugoi Church Contribution	-	\$185
Lengai Camp Site Rental Fee Londolo Village		\$3,086
Uhuru Torch Contribution		\$370
Village Meeting Allowances		\$802
Contribution Towards Establishment of Wildlife Wildlife Management Area to Wildlife Department		\$617
Pinyina Camp Site Rental Fee Payment to Villages with Pending Land Dispute		\$1,235
Administrative Costs		\$556
2013 Total		\$34,531
2014		
Village Contributions		\$21,951

Water Distribution to Villages	42 trips x Tsh 300,000/- per trip	\$7,683
Pinyina Camp Site Rental Fee Payment to Villages with Pending Land Dispute		\$1,220
Uhuru Torch Contribution		\$366
Village Meeting Allowances		\$1,700
Construction Contribution to Longido Secondary School		\$3,049
Lengai Camp Site Rental Fee Londolo Village		\$3,049
Administrative Costs		\$610
2014 Total		\$39,627
2015		
Village Contributions	Tsh 3,000,000/- x 8 villages	\$11,321
Contribution to Longido Police Station		\$472
Village Fuel Contribution	200 liters x Tsh 1,871	\$177
Contribution of 200 Bags of Cement to Flamingo Secondary School		\$1,726
Pinyina Camp Site Rental Fee Payment to Villages with Pending Land Dispute		\$943
Lengai Camp Site Rental Fee Londolo Village		\$2,358
Uhuru Torch Contribution		\$283
Village Meeting Allowances		\$755
Sponsorship of Miryam Lemayan at Higher Education Institution		\$472
Administrative Costs		\$472
2015 Total		\$18,978
Grand Total		\$93,136

Community Development Expenses for Lukwati Game Reserve South 2013-2015		
Community Development Particular	Remarks	Cost
2013		
Village Contribution to Somee and Gua Villages	\$2,500 per village	\$5,000
Footballs and Uniform		\$512

Contribution		
Contribution to Kitembwe Church		\$185
Uhuru Torch Contribution	Chunya District	\$185
Administrative Costs		\$556
2013 Total		\$6,438
2014		
Village Contribution to Somee and Gua Villages	\$2,500 per village	\$5,000
Contribution Towards Construction of Gua Village Health Clinic		\$4,878
Contribution Towards Construction of Kapalala Secondary School Laboratory		\$2,439
Uhuru Torch Contribution		\$305
Football Contribution		\$178
Administrative Costs		\$549
2014 Total		\$13,699
2015		
Village Contribution to Somee and Gua Villages	\$2,500 per village	\$5,000
Contribution Towards Construction of Somee Village Health Clinic		\$4,717
Contribution Towards Farewell Party for District Commissioner Kinawiro		\$236
Umoja Wanawake Tanzania	Women's group	\$219
Uhuru Torch Contribution		\$472
Conservation Workshop in Chunya Village		\$472
Administrative Costs		\$425
2015 Total		\$11,540
Grand Total		\$31,667

Grand Total of Community Development Expenses for Michel Mantheakis Safaris 2013-2015	
Community Development Particular	Cost
Community Development Total for Lake Natron Game Controlled Area West	\$93,136
Community Development Total for Lukwati Game Reserve South	\$31,667
Community Development Grand Total	\$124,803

Conservation Workshops

In 2015, Mr. Mantheakis funded and conducted a conservation workshop. All members of the community were invited, especially children and young adults were to attend. The goals was to explain the threat wildlife and habitat destruction have on the longevity of a hunting concession, the important role the communities play in wildlife and habitat conservation, the financial benefits communities receive as a result of hunting, and the necessity to overlook the short term benefits of wildlife and habitat poaching and focus on the long term benefits of wildlife and habitat conservation. Attendance was strong and Mr. Mantheakis found the conservation workshop to be a very beneficial tool in further emphasizing the important role communities play in wildlife conservation and aids in maintaining a continuous and healthy relationship between the company and communities. The company will continue to conduct conservation workshops in the future.

Village Employment

The camp staff in the hunting concessions is comprised 50% of community members. Moreover, it adds a significant source of income for the staff and their families. Community members are also hired to assist in anti-poaching operations. Lastly, prior to the beginning of every hunting season the company employs approximately 12 community members to assist the camp staff for four to five months in opening roads. This employment serves to strengthen ties between the company and the communities.

Additional Information

Sustainable Prey Base Specie Management

Mr. Mantheakis has built a reputation in the hunting industry as a leader in ethical and sustainable hunting. Mr. Mantheakis only employs very experienced professional hunters with decades of professional hunting skill in Tanzania and other African countries who maintain an equally ethical and sustainable approach to hunting.

Professional hunters are dedicated to one hunting concession so they may become very familiar with the hunting concession and the wildlife within. Company professional hunters are required to harvest only mature male animals. Through their experience and proficiency in judging and aging animals they are able to pinpoint characteristics of maturity such as fully hardened bosses on buffalo, secondary horn base growth on species like sable and roan, and worn down bases and tips. Also, professional hunters are required to know and adhere to all regulations set forth in the Wildlife Conservation Act.

The company professional hunters serve as a valuable tool in setting the annual hunting quotas. They are very familiar with the hunting concessions and are able to assist in setting sustainable quotas in the concessions. When combined with the off take of only mature species, the protection of prey base species is ensured through sustainable hunting

practices. The company and its professional hunters are emotionally and financially invested in the longevity and prosperity of the wildlife and habitat within the concession. Establishing very high quotas and equally high off take would only serve to hurt the concession and in turn hurt the company.

Sustainable Lion Management

Since 1997, Mr. Mantheakis has established a strict lion hunting policy. The company professional hunters are prohibited from harvesting a pride male lion. Company professional hunters must also follow the six year old requirement under Tanzania Regulation.

The company has implemented two procedures to ensure the off take of non-pride males six years of age and older. As mentioned in the above section, professional hunters are dedicated to one hunting concession. In the case of Lukwati Game Reserve South, since 2013 Mr. Mantheakis and one other professional hunter have spent the majority of each hunting season in that concession. This allows them to become very aware and familiar with the different lion in the concession. This hands on knowledge is supported by a record of lion photos collected from game cameras and digital cameras. Professional hunters are required to submit all lion photos to company management. The photos allow the company to have a large stock of photos of lion over the years and properly identify and age lion. Male lion are known to leave the pride at times to navigate their territory. It is during this time a male lion may be lured to a bait. By having professional hunters very familiar with the lion in the area and many pictures of all lion in the area they are able to determine that particular lion is in fact in a pride. This eliminates the chance of hostile take over by another male lion and lion infanticide.

Lukwati Game Reserve South is the only hunting concession under Mr. Mantheakis's stewardship where lion hunting safaris are conducted. Since 2013, the annual lion quota has been set at four per year since 2013. The concession has a very dense lion population increasing year after year. The company attributes this to the low off take given the dense lion population and only harvesting non-pride males six years of age and older. A total of five lion have been harvested since 2013. Two were harvested in 2013, two were harvested in 2014, and one was harvested in 2015. Although the concession has four lion on quota, only two may be harvested per year. Lukwati Game Reserve South is one of the most remote hunting concessions in Tanzania and no villages or cattle are allowed in the concession. The concession also does not share a border with any villages. Furthermore, the area enjoys an equally dense population of prey base species leading lion to have more compact territories and no need to seek out livestock nor interact with humans. As a result of the above factors and no reported instances of human lion conflict from company informants, no human lion deterrent agreements have been formed with the villages under the care of Mr. Mantheakis. If a single instance of human lion conflict occurred, such an agreement would be gladly formed. However, with the vast benefits and incentives enjoyed by the villages, the company is certain no retaliatory measures would be taken against lion in such a situation.

The lion populations throughout Masailand declined in 2011 due to attacks conducted by members of the Masai tribe. As a result, Mr. Mantheakis does not conduct lion safaris in Lake Natron Game Controlled Area West and will not in Longido Game Controlled Area. Although lion are not hunted in these concessions, human lion deterrent agreements have been implemented to compensate herdsman the value of lost livestock caused by lion. The agreements serve as deterrents for the Masai to not partake in retaliatory killings against lion. Furthermore, as seen in the "Community Development Activities & Expenses" section, large contributions have been made in Lake Natron Game Controlled Area West and the company plans to follow suit in Longido Game Controlled Area West. The goal of the extensive investments in Lake Natron Game Controlled Area West is to give the Masai a deeper sense of involvement in the success of wildlife conservation in the hunting concession. They are experiencing first hand the great benefits of working side by side with the company in conserving the concession's pristine wildlife and habitat. As a result of these efforts, all forms of poaching have all but been eliminated from the concession and there have been no retaliatory killings against lion in the concession. Although no lion safaris are conducted in Lake Natron Game Controlled Area West the company still maintains a monitoring program of lion. A definite increase in lion numbers is experienced yearly as a result of the efforts taken by the company. It is important to note that although the company does not offer high revenue generating lion safaris in Lake Natron Game Controlled Area West and Longido Game Controlled Area, these hunting areas still remain economically viable for hunting. Masailand produces very large bodied leopard and these safaris are sold at a premium. Moreover, Masailand is home to some of the most unique plains game species such as lesser kudu, gerenuk, fringe eared oryx, Robert's gazelle, and Coke's hartebeest. These species are unique to Northern Tanzania and hunting companies operating in Masailand are able to maintain hunting operations in these areas without lion safaris. However, without these unique species and large leopard Masailand areas would not be economically viable with the necessary anti-poaching and community development required for these areas.

Elephant Status

Upon entering Lukwati Game Reserve South in 2013, the area was noticeably subject to organized elephant poaching. Elephant carcasses scattered the terrain and elephant behavior towards company staff and the anti-poaching units was indicative of harassment. Since being allocated the Lukwati concession, non-stop anti-poaching has been implemented and maintained in the concession. As a result, a definite increase in elephant movement and populations has been experienced.

Leopard Status

Leopard are abundant in the hunting concessions due to a healthy and numerous prey base in the concessions, which allows for more leopard having smaller territories.

American Lion Hunting Market

The American lion hunting market plays a huge role for Michel Mantheakis Safaris and all outfitters in Tanzania. From 2013-2015, 100% of the lion safaris conducted in Lukwati Game Reserve South were for American clientele. As a result of the lion listing in 2015, no lion safaris were sold to American clients. This resulted in Mr. Mantheakis having to travel to tradeshows around the world in attempt to sell the hunts. Three lion safaris were sold at a discounted ranging from 65%-75% their normal value. Moreover, one less lion safari was sold than in previous years. This has placed the company in a very difficult position having just taken on Longido Game Controlled Area while maintaining its extensive anti-poaching and community development undertakings. Lion safaris are the financial backbone of the vast majority of hunting concessions in Tanzania. Even with very low success rates, American hunters are very eager for the opportunity to hunt lion in the most pristine hunting grounds Africa has to offer. An area like Lukwati Game Reserve South is not economically viable without lion importation into the United States, thus largely leaving the area with seriously discounted lion hunts, and low revenue producing leopard and buffalo hunts. All the anti-poaching and community development activities are completely funded by the revenue the company receives from its hunting safaris. If lion cannot be imported into the United States, operators will be left with two devastating options: return their concessions as they are unable to financially afford them or make large scale reductions in their anti-poaching and community development expenses. Both of these real and unfortunate truths will lead to large scale poaching invading the concessions and destroying the wildlife and habitat present therein.

Conclusion

Michel Mantheakis Safaris enhances the survival of lion by enthusiastically fighting against loss of prey base, loss of habitat, and human lion conflict.

Various measures have been implemented to protect against loss of prey base and leading to an increase of prey base specie numbers. Anti-poaching plays a vital role in protecting against loss of prey base and thus enhancing lion survival. Since 2013, the company has spent \$243,296 on anti-poaching efforts in the Lukwati and Lake Natron concessions and plans to apply similar efforts to Longido Game Controlled Area. The anti-poaching units have yielded fantastic results in their battle against all forms of poaching. The professional hunters employ an ethical and sustainable management based approach to harvesting all animals. All off take is limited to mature males and sustainable quotas are established every year with the experienced and conservation minded input of the professional hunters. The company has undertaken large community development expenditures as part of its own corporate social responsibility and conservation approach. By implementing community development in the villages the overall standard of living experienced by the villagers is greatly improved. Furthermore, the community development activities serve to act as an incentive for the communities to as partners with the company as stewards and conservationists of the hunting concessions. In sum, all of

these measures have not only combatted against loss of prey base but also resulted in an increase of prey base species in the hunting concessions.

Loss of habitat is a serious threat and handled much in the same way as loss of prey base. The anti-poaching units seek out all forms of poaching. Timber poaching, illegal charcoal burning, and cattle encroachment are all serious offenses in the hunting concessions and have been adequately handled by the anti-poaching teams. Their continuous year-round monitoring of the concessions does not allow for any stronghold of poachers or cattle herdsman to remain in the concessions for any amount of time. Furthermore, the company has drilled two boreholes for the Masai in Lake Natron Game Controlled Area West in order to ease pressure off natural springs and waterholes for the wildlife.

Human lion conflict is not an issue faced in Lukwati Game Controlled Area South due to the true remoteness of the concession, dense prey base population in the concession allowing lion to remain in the concession, and effective community development activities in the villages deterring the villagers from partaking in any retaliatory killing. With the network of informants in the villages, the company is sure no livestock have been lost as a result of lion in the villages under the Lukwati concession's stewardship. However, if human lion conflict became an issue in the concession, the company is ready to implement the similar agreements it has established in Lake Natron Game Controlled Area West and Longido Game Controlled Area. Although no lion hunts are conducted in the Lake Natron and Longido concessions, human lion deterrent agreements have been implemented to prevent retaliatory killings.

Operator Name: Michel Mantheakis Safaris Ltd.

Name: Michel Mantheakis

Position: Owner and Managing Director

Signature: 

Appendix

No.	Description	Remarks
1	Performance Letter	From Minister of Natural Resources and Tourism
2	Anti-Poaching Bank Transfers*	2015-2016
3	Anti-Poaching Photographs	
4	Community Development Bank Transfers and Letters of Thanks	2013-2016
5	Community Development Photographs	
6	Lion Photographs	All photographs are from currently allocated hunting concessions

*2016 expenses not calculated in Operator Enhancement Report

RCVD JUN 8 2017

(b) (6)

(b) (6)

Pay to the Order of US Fish & Wildlife Service Date 5/22/2017

one hundred and no/100 \$ 100 00/100

Dollars

Bank of America

ACH/EFT 122101706

For [Signature]

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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March 4, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 15 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

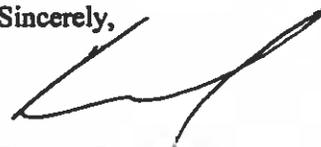
Enclosed please find three applications to import sport-hunted lion trophies. The first applicant is hunting in South Africa, at Khamab Kalahari Game Reserve, an area that has been designated to have "wild" lion by South Africa's Department of Environmental Affairs. Please refer to the attached list and information in the DMA's files, which includes the management plan for this reserve. The applicant is lawfully hunting a lioness as a population control measure, as explained in the attached justification. Please consider that information and the information previously submitted by South Africa's DEA and Conservation Force in making a positive enhancement finding for this applicant.

The second applicant is hunting in Tanzania with Rungwa Safaris/Bundu Safaris. This operator has submitted an enhancement report, which was sent to the DMA in October 2016 and is attached for ease of reference. Please consider that information and the information previously submitted by Tanzania's Ministry of Natural Resources and Tourism/Wildlife Division/Tanzania Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

The third applicant is hunting in Zimbabwe in the Dande South concession. This concession incorporates extensive anti-poaching and community investment. We will shortly submit an enhancement report from this operator. Please consider that information and the information previously submitted by Zimbabwe's Parks and Wildlife Management Authority, Conservation Force, and others in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions.

Sincerely,



Regina Lennox

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, Regina Lennox, and other attorneys of the non-profit law firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that Conservation Force be copied with all correspondence, acknowledgements, notices, and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
cf@conservationforce.org

Signed: _____

Name: Julian A. Sullivan

Date: 02/06/2018



Department of the Interior
U.S. Fish and Wildlife Service

MAR 15 2018

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Threatened-listed lion

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

Section A: Complete if applying as an individual. Fields include: 1.a. Last name (Sullivan), 1.b. First name (Julian), 1.c. Middle name or initial ((b) (6)), 1.d. Suffix, 2. Date of birth ((b) (6)), 3. Social Security No., 4. Occupation, 5. Affiliation/ Doing business as, 6.a. Telephone number ((b) (6)), 6.b. Alternate telephone number, 6.c. Fax number, 6.d. E-mail address.

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution. Fields include: 1.a. Name of business, agency, Tribe, or institution (N/A), 1.b. Doing business as (dba), 2. Tax identification no., 3. Description of business, agency, Tribe, or institution, 4.a. Principal officer Last name, 4.b. Principal officer First name, 4.c. Principal officer Middle name/ initial, 4.d. Suffix, 5. Principal officer title, 6. Primary contact name, 7.a. Business telephone number, 7.b. Alternate telephone number, 7.c. Business fax number, 7.d. Business e-mail address.

Section C: All applicants complete address information. Fields include: 1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) ((b) (6)), 1.b. City (Madison), 1.c. State (Alabama), 1.d. Zip code/Postal code: ((b) (6)), 1.e. County/Province, 1.f. Country (USA), 2.a. Mailing Address (include if different than physical address; include name of contact person if applicable), 2.b. City, 2.c. State, 2.d. Zip code/Postal code:, 2.e. County/Province, 2.f. Country.

Section D: All applicants MUST complete. 1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. 2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Bontebok MA24105C-0 No []. 3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 30 Feb 2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo melanochaita
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe, Dande South
 - b. Date wildlife is to be hunted:
12 - 24 September 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
skin, skull, teeth, claws -- all parts for life-sized mount
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Name: Anthony Crick
Business Name:	Business Name: HHK Safaris (Pvt) Ltd
Address:	Address: 4 Wayhill Lane West,
Address:	Address: Umwinsidale,
City:	City: Harare
State/Province:	State/Province: Mashonaland Central
Country, Postal Code:	Country, Postal Code: 0000

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force and range states authorities and operators. CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

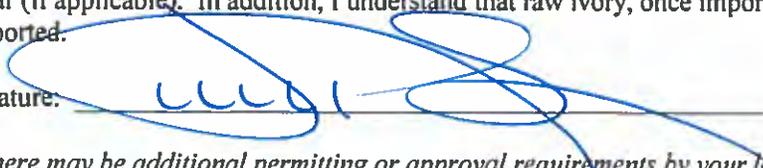
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 20 Feb 2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE

Mr. Brar is also the owner Nimali Africa Safari, a photographic company with camps in the Tarangire National Park. However, he maintains that hunting is the best form of conserving wildlife and habitat.

In 2015, each hunting company must submit a three-year report to the Ministry of Natural Resources and Tourism. The basis of the reports are payment of government fees, conducting hunting safaris in a legal and ethical manner, company anti-poaching expenses and results, and community development. In December of 2015, each company received a letter from the Ministry applauding their excellence and commitment to conservation. The companies are pre-qualified for renewal of their currently allocated areas by continuing their current efforts.

DESCRIPTION OF HUNTING AREAS

RUNGWA GAME SAFARIS

Rungwa Mpera Game Reserve & Kizigo West Game Reserve

Rungwa Mpera Game Reserve and Kizigo West Game Reserve share a border as well as with the Ruaha National Park. This allows the anti-poaching units to effectively monitor both areas. Rungwa Mpera Game Reserve spans 2,068 square kilometers and Kizigo West Game Reserve is 1,288 square kilometers. These areas have an established road network. The areas act as a dry season refuge for the Ruaha National Park due to natural springs and pools. Lion are abundant in these areas because of the large prey base protected by the anti-poaching teams. Wildlife frequently viewed in the areas are buffalo, kudu, sable, roan, eland, zebra and hartebeest. The company acquired Kizigo West Game Reserve at the beginning of 2014.

Selous Game Reserve K1

The Selous Game Reserve is the largest game reserve dedicated to hunting and photographic tourism. The vast majority of the Reserve has been set aside for hunting. Selous K1 Game Reserve is located in the far western part of the Reserve covering 332 square kilometers. The area boasts a strong lion population. The Selous Game Reserve is home to the largest population of buffalo in Africa and the company's anti-poaching campaigns help maintain strong buffalo numbers in the area. Furthermore, healthy herds of elephant, sable, hippo, wildebeest, zebra, waterbuck, impala, hippo, and crocodile are present. The company obtained Selous Game Reserve K1 in early 2014.

Tanzania Bundu Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$138,000	\$138,000	\$138,000
License Fees	\$117,300	115,354	\$55,300
Trophy Fees	\$294,600	\$323,760	\$185,490
TALA License	\$2,400	\$3,000	\$2,200
PH License Fees	\$8,000	\$9,000	\$7,000
YEARLY TOTAL	\$560,300	\$589,114	\$387,990
GRAND TOTAL	\$1,537,404		

ANTI- POACHING

Anti- Poaching Approach

The company deploys its own anti-poaching units several times a month in each hunting area. Because company scouts do not have the mandate to arrest, several government game scouts are hired every year by the company to aid in anti-poaching efforts. Each anti-poaching unit is provided a vehicle, food rations, and other equipment to be successful in their patrols. Furthermore, every unit is comprised of five to eight individuals. Most patrols begin by driving along the border of the various areas and finding where poachers have entered. Anti-poaching patrols are conducted year-round.

Poaching in Africa takes many forms. Of the most frequently encountered are meat poaching with weapons and snares, timber poaching, and illegal charcoal burning. Destruction of habitat is just as dangerous to Africa's wildlife as animal poaching. Any and all forms of poaching are viewed as serious offenses and are heavily monitored by the anti-poaching units.

The hunting areas in Tanzania are truly wild and remote locations. The only road networks in place are the ones that are built and maintained by the hunting company. The company dispatches road construction teams several months before the beginning of the hunting season. The company is extremely proud of the fact that since 2013 over 720 kilometers of new roads have been opened. Reopening established roads and opening new roads enables the anti-poaching units to effectively patrol the area and extend the hunting range used by the hunters.

Anti- Poaching Contributions

The companies have vowed a large portion of their income to anti-poaching. This is viewed as an investment rather than an expense.

Amounts in USD
 Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1
 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$20,179	\$20,788	\$19,945
Vehicle Repair	\$4,088	\$2,852	\$2,891
Vehicle Depreciation	\$5,000	\$5,000	\$5,000
Road Opening	\$10,377	\$9,705	\$10,200
Government Anti-Poaching Contributions	\$1,415	\$617	\$798
YEARLY TOTAL	\$41,059	\$38,962	\$38,834
GRAND TOTAL	\$118,855		

Anti- Poaching Results

The anti-poaching units have made a huge impact in the hunting areas. Over the course of three years over 65 bicycles used by timber and animal poachers have been seized. In addition to this a number of poacher's contraband has been seized including over 40 axes, 30 machetes, and 40 saws. Furthermore, 6 trucks full of illegal timber have been apprehended and commandeered along with other seizures of illegally poached timber in the bush. To navigate during the rainy season and poach for fish, poachers use canoes. To date 40 canoes have been confiscated along with over 150 illegal fishing nets. Since 2013, 45 meat poachers have been arrested with over 650 rounds of ammunition and 13 rifles. Lastly, 75 timber poachers have been arrested.

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROGRAMS

Bore Hole Drilling Projects

Being located in Northern Tanzania, Lolkisale Game Controlled Area, Masai Open Area West, and Mkungunero Game Reserve have members of the Masai tribe living in the areas. Masailand is a very dry region of Tanzania with water in September until the rains in December becomes more and more scarce. The rich Masai culture is centered on their cattle. The cattle and wildlife are competing for water. Without proper measures in place, operating a hunting area amongst the Masai cattle can be a challenge. In order to ease pressure off the natural springs and waterholes, the company has taken on large expenses to drill and

2014. Although the company exceeded 2013 community development funds, it was unable to make the full contributions that it intended. However, with the funds available, another year's worth of food was donated to the Kimotorok school. Also, the company fully funded the construction of a new restroom facility for the primary school in Loiborsiret village. Another Tshs 1,300,000/- was contributed to the Monduli district to build a blood donation center and other projects. A cash contribution was given to the Woman's Welfare Group in the Narakavu village.

In addition to the contributions made by Mr. Brar's companies, American hunters have played a huge role in the villages. Almost every American hunter comes with school and medical supplies, clothes, shoes, and sports equipment. Furthermore, some hunters choose to leave cash that is directly donated to the village schools. Tens of thousands of dollars worth of supplies and cash have been contributed to the villages by American hunters.

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Community Development			
Village	2013	2014	2015
Mwamagembe	Tshs 8,700,000/-	Tshs 4,250,000/-	Tshs 10,800,000/-
Kilumbi	Tshs 6,600,000/-	Tshs 8,500,000/-	-
Kiyombo	Tshs 2,700,000/-	Tshs 4,250,000/-	-
Kivukoni	Tshs 7,800,000/-	Tshs 8,500,000/-	Tshs 5,400,000/-
Lulanga	-	-	Tshs 5,400,000/-
Minepa	-	-	Tshs 10,800,000/-
YEARLY TOTAL	Tshs 25,800,000/- \$16,226	Tshs 25,500,000/- \$15,000	Tshs 32,400,000/- \$17,513
GRAND TOTAL	Tshs 83,700,000/- \$48,739		

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Community Development			
Village	2013	2014	2015
Loiborsiret	Tshs 16,000,000/-	Tshs 6,000,000/-	Tshs 6,500,000/-
Emboret	Tshs 5,000,000/-	-	-

	\$13,243
GRAND TOTAL	Thsh 70,500,000/- \$41,198

Game Meat Donations

The company maintains a program of contributing game meat to villagers located within and next to the hunting area. An estimated 30% of the total game meat harvested throughout the season is donated to the local communities as well as to the government anti-poaching units. Doing so provides the villagers with a much needed source of protein and discourages indiscriminate meat poaching.

Community Education Programs

Having completed his Bachelor's Degree, Mr. Brar understands the impact that education can have. For this reason the company maintains continuous education programs in the schools surrounding and within the hunting areas. With the aid of school directors and teachers, the company helps conduct lessons that teach the students the importance of wildlife conservation. As explained above, these rural communities rely heavily on company financial and game meat contributions. These lessons help instill in the youth an appreciation and understanding of the wildlife and their habitat. Without hunting companies in these areas these children and families would have no use for the wildlife in the areas and a definite increase in poaching and illegal activity would result.

ADDITIONAL INFORMATION

Sustainable Hunting Management Program

Mr. Brar is very selective when it comes to employing his professional hunters. Only highly experienced professional hunters with a strong ethical and legal approach to hunting are hired. Furthermore, every professional hunter must have a firm knowledge in effective management practices to maintain the longevity of wildlife in the areas. The professional hunters do not take their jobs lightly and understand their role as stewards of wildlife. In the off-season, and when there are breaks in their hunting schedule, the professional hunters offer their expertise and accompany the anti-poaching units.

The company's professional hunters are required to sign a contract that outlines their duties and obligations. The professional hunter contract ensures a sustainable management program by:

	Hippo	1	0
	Greater Kudu	4	2
	Roan	3	2
	Sable	4	2
	Zebra	8	3
Kizigo West Game Reserve			
2014	Buffalo	20	8
	Eland	4	1
	Hartebeest	10	6
	Greater Kudu	4	2
	Roan	5	1
	Sable	5	3
	Zebra	10	6
2015	Buffalo	5	3
	Eland	2	1
	Hartebeest	4	1
	Greater Kudu	2	0
	Roan	2	1
	Sable	2	1
	Zebra	4	0
Selous Game Reserve K1			
2014	Buffalo	15	5
	Eland	2	1
	Hartebeest	10	5
	Hippo	5	2
	Sable	3	1
	Waterbuck	6	2
	Wildebeest	8	1
	Zebra	10	1
2015	Buffalo	10	5
	Eland	1	0
	Hartebeest	4	3
	Hippo	1	0
	Sable	0	0
	Waterbuck	1	0
	Wildebeest	2	1
	Zebra	3	2

Tanzania Bundu Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Lokisale Game Controlled Area			
2013	Buffalo	30	15
	Eland	7	3

	Lesser Kudu	3	2
	Oryx	5	3
	Wildebeest	15	8
	Zebra	15	6
Mkungunero Game Reserve			
2013	Buffalo	1	1
	Eland	1	0
	Hartebeest	1	0
	Greater Kudu	1	0
	Lesser Kudu	1	1
	Oryx	7	0
	Wildebeest	1	0
	Zebra	1	1
2014	Buffalo	8	8
	Eland	3	0
	Hartebeest	5	2
	Greater Kudu	2	2
	Lesser Kudu	4	3
	Oryx	2	1
	Wildebeest	5	1
	Zebra	1	0
2015	Buffalo	3	3
	Eland	1	0
	Hartebeest	3	0
	Greater Kudu	1	1
	Lesser Kudu	2	1
	Oryx	1	1
	Wildebeest	3	1
	Zebra	3	2

Sustainable Lion Hunting Management Program

The company has in place several measures to ensure the sustainable off take of lion in each hunting area. The professional hunter contract requires proper selection of hunted lion. Under no circumstances may a male lion under 6 years old be harvested. Doing so results in a fine of \$20,000 along with the government fines. It is also absolutely prohibited for any lioness to be hunted and no male lion in a pride may be harvested.

Male lion are known to leave their pride to patrol their range. So that a pride male lion is not harvested, the company maintains a lion record. Professional hunters are provided with trail cameras. Trail camera pictures are compiled and entered into the record and the professional

Human Lion Deterrent Agreements

Cattle are an easy source of food for lion in the Masailand areas. Many Masai view lion as a threat to their cattle. However, in order to prevent retaliatory killings against lion, the company has established a system of compensating the Masai for any lost cattle to lion. Since 2010, a total of \$7,500 has been paid directly to herdsman for lost cattle. This compensation system has proven effective at deterring retaliatory killings.

American Hunters

The charts below demonstrate the large role that American hunters play in the company's clientele base as well as the sharp decline in American clients:

Table 1: Rungwa Game Safaris American Hunters 2013- 2015

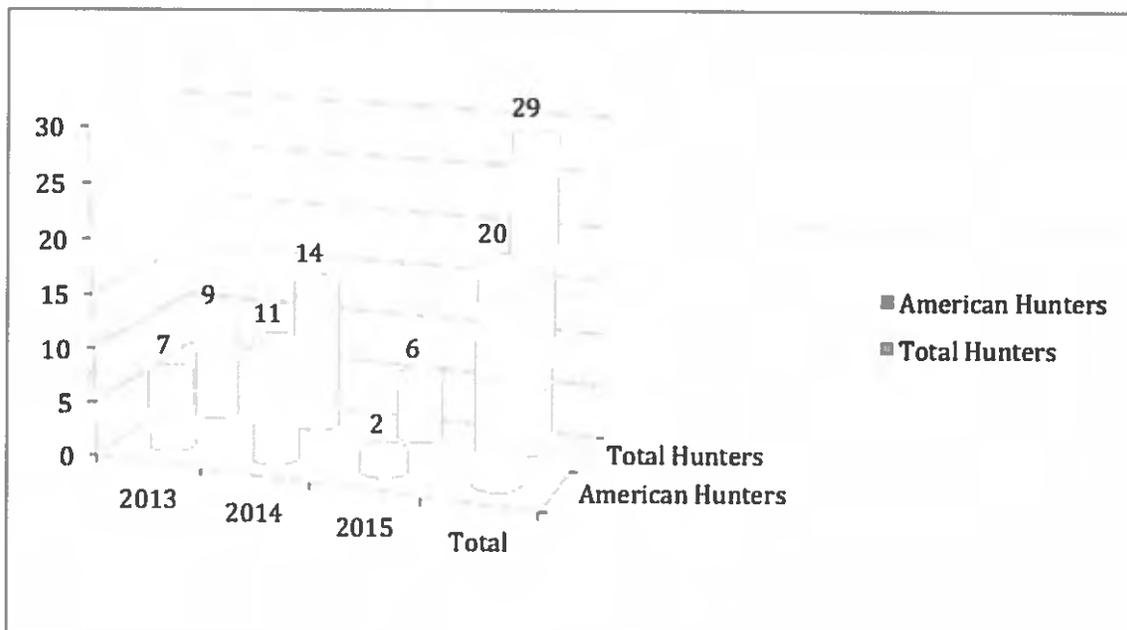


Table 3: Rungwa Game Safaris American Lion Hunters 2013- 2015

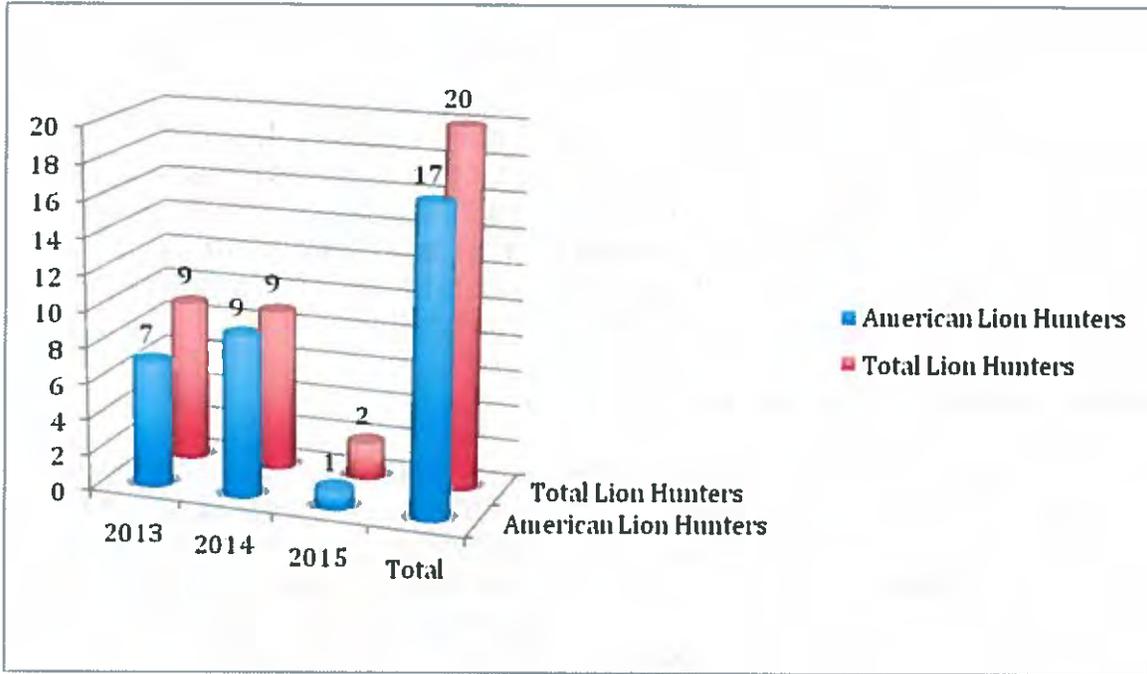
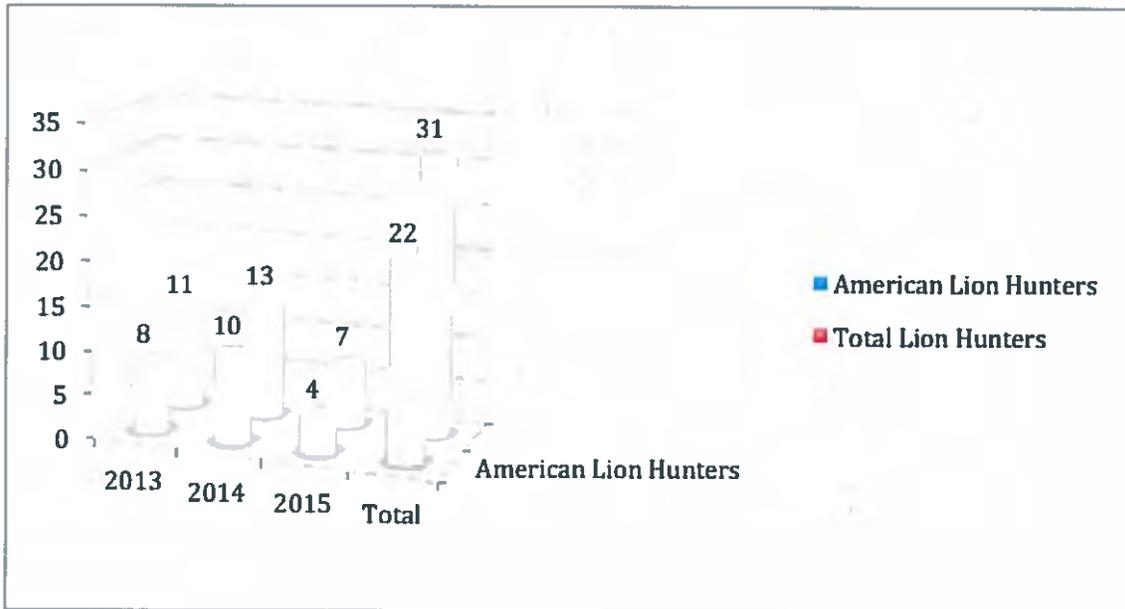


Table 4: Tanzania Bundu Safaris American Lion Hunters 2013- 2015



Exported Lion

Since 2013, six male lion were successfully harvested. The company is proud to report that all lion harvested in 2013 and 2014 were exported in

classroom education programs regarding hunting as a conservation tool teaches the students the negative impacts that poaching plays and how hunting plays a beneficial role in their daily lives. Lastly, the continuous game meat contributions serve as an active deterrent to meat poaching. The prey base species in the hunting areas continue to flourish and increase in number.

The company provides for the protection of habitat and reduces habitat loss. The anti-poaching teams treat timber poaching and illegal charcoal burning just as seriously as meat poaching. The units have had great success in seizing illegal timber and illegal timber contraband as well as destroying charcoal burning kilns. The boreholes also serve as tools for habitat protection as they have taken a great deal of pressure off the natural springs and waterholes.

Mr. Brar has specifically addressed the threat of human lion conflict by establishing agreements in the Masailand areas whereby cattle killed by lion are reimbursed their full market value. These agreements have been very effective at handling potential human lion conflict.

	Fuel Expenses	
20	Tanzania Bundu Safaris Anti-Poaching Wages and Food Expenses	2013-2015
21	Tanzania Bundu Safaris Anti-Poaching Reports	
22	Anti-Poaching and Illegal Timber Photos	
23	Rungwa Game Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgment	2013-2015
24	Tanzania Bundu Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgement	2013-2015
25	Community Development Photos	
26	Rungwa Game Safaris & Tanzania Bundu Safaris Professional Hunter Contracts	
27	Rungwa Game Safaris Allocated Quota	2013-2015
28	Tanzania Bundu Safaris Allocated Quota	2013-2015
29	Prey Base and Wildlife Photos	From Company Hunting Areas
30	Lion Photos	From Company Hunting Areas
31	"Custodians of Wilderness" Film	On file with United States Fish and Wildlife Service

MAR 15 2018

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61-351/622

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DATE 20 Feb 2018

PAY TO THE ORDER OF

US Fish and Wildlife Service \$ 100.00

One Hundred and 00/100

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March 22, 2018

RCVD MAR 27 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

Enclosed please find four applications to import sport-hunted trophies.

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km² property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over \$61,000/year in anti-poaching, \$45,000/year in community projects, and \$30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: David Turner

Name: David (b) (6) Turner

Date: 3/13/2018



Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

RCVD MAR 27 2011

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Turner	1.b. First name David	1.c. Middle name or initial W	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No. (b) (6)	4. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information			
1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)			
1.b. City Middleton	1.c. State Idaho	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province
1.f. Country USA			
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable) same			
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province
2.f. Country			

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <u>08US188472/9</u> No <input type="checkbox"/>	
3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <u>Ua Turner</u> <u>3-12-2018</u> Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera leo, African Lion
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
K1 Selous Game Reserve
 - b. Date wildlife is to be hunted:
August 16-September 5, 2018
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Skin, Skull, claws, teeth
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
 - b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

Rungwa Game Safaris
1 Sable Square Shopping Village Kisongo, Arusha Tanzania

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: Rungwa Game Safaris
Business Name:
Address: 1 Sable Square
Address: Shopping Village
City: Kisongo, Arusha
State/Province:
Country, Postal Code: Tanzania

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

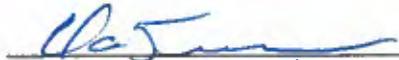
6. If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: 3/12/2018
Dave Turner

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

David W. Turner

(b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE

Rungwa Game Safaris

T A N Z A N I A



P.O. Box 13946 Arusha, Tanzania

Tel: (255) 748 475779

Email: info@rungwasafaris.com

Website: www.rungwasafaris.com

RE: Operator Enhancement Report

COMPANY DESCRIPTION

Harpreet Brar is the owner and Managing Director of Rungwa Game Safaris and Tanzania Bundu Safaris. Upon receiving a Bachelor's Degree in Business Administration and Advertising from John Brown University USA, Mr. Brar began his apprenticeship to become a professional hunter. In 1997, he became a licensed professional hunter. With the lifelong goal of owning his own hunting company, he started Rungwa Game Safaris in 2000. Mr. Brar is a dedicated conservationist and firm believer in sustainable hunting practices to protect Africa's wildlife and habitat. In 2010, he acquired Tanzania Bundu Safaris. Mr. Brar has become one of Tanzania's largest outfitters providing quality safaris while supporting and enhancing Tanzania's wildlife and habitat.

The two companies are managed and operated out of the central office in Arusha, Tanzania. The company employs 150 camp staff, four professional hunters, and four administrative personnel. Even though the hunting season lasts from July to December, the company believes it is their corporate social responsibility to employ their staff year-round. Approximately, 25% of camp staff is comprised of individuals from the neighboring communities. The company further supports the neighboring communities by hiring casual laborers for construction and road opening. Through this employment and by maintaining community development projects and funding, the company has built and maintained a strong relationship with neighboring villages.

Mr. Brar is also the owner Nimali Africa Safari, a photographic company with camps in the Tarangire National Park. However, he maintains that hunting is the best form of conserving wildlife and habitat.

In 2015, each hunting company must submit a three-year report to the Ministry of Natural Resources and Tourism. The basis of the reports are payment of government fees, conducting hunting safaris in a legal and ethical manner, company anti-poaching expenses and results, and community development. In December of 2015, each company received a letter from the Ministry applauding their excellence and commitment to conservation. The companies are pre-qualified for renewal of their currently allocated areas by continuing their current efforts.

DESCRIPTION OF HUNTING AREAS

RUNGWA GAME SAFARIS

Rungwa Mpera Game Reserve & Kizigo West Game Reserve

Rungwa Mpera Game Reserve and Kizigo West Game Reserve share a border as well as with the Ruaha National Park. This allows the anti-poaching units to effectively monitor both areas. Rungwa Mpera Game Reserve spans 2,068 square kilometers and Kizigo West Game Reserve is 1,288 square kilometers. These areas have an established road network. The areas act as a dry season refuge for the Ruaha National Park due to natural springs and pools. Lion are abundant in these areas because of the large prey base protected by the anti-poaching teams. Wildlife frequently viewed in the areas are buffalo, kudu, sable, roan, eland, zebra and hartebeest. The company acquired Kizigo West Game Reserve at the beginning of 2014.

Selous Game Reserve K1

The Selous Game Reserve is the largest game reserve dedicated to hunting and photographic tourism. The vast majority of the Reserve has been set aside for hunting. Selous K1 Game Reserve is located in the far western part of the Reserve covering 332 square kilometers. The area boasts a strong lion population. The Selous Game Reserve is home to the largest population of buffalo in Africa and the company's anti-poaching campaigns help maintain strong buffalo numbers in the area. Furthermore, healthy herds of elephant, sable, hippo, wildebeest, zebra, waterbuck, impala, hippo, and crocodile are present. The company obtained Selous Game Reserve K1 in early 2014.

TANZANIA BUNDU SAFARIS

Lolkisale Game Controlled Area, Masai Open Area West & Mkungunero Game Reserve

All three of these areas are located in Northern Tanzania in what is commonly referred to as Masailand. These areas are unique because members of the Masai tribe reside within the hunting area. All three areas border the Tarangire National Park, and Lolkisale Game Controlled Area and Masai Open Area West share a border with each other. The areas contain many unique Masailand species such as lesser kudu, fringe eared oryx, and gerenuk as well as elephant, wildebeest, zebra, buffalo and hartebeest. For part of the year, the area is home to the Eastern White Bearded Wildebeest and Zebra migration that occurs in the Tarangire National Park and its surrounding areas.

Lolkisale Game Controlled Area is 1,082 square kilometers, Masai Open Area West is 985 square kilometers, and Mkungunero Game Reserve is 767 square kilometers.

GOVERNMENT FEES

Since 2013 the company has paid \$2,467,274 in government fees. These funds are used by the government to pay salaries to the game officers and fund conservation projects.

The company has paid fewer government fees in 2015, and a similar result is expected in 2016. This decline is due to fewer lion safaris booked by U.S. citizens as a result of the listing of African lion under the U.S. Endangered Species Act. Three lion hunts were cancelled and fully reimbursed for the 2016 season.

Amounts in USD

Rungwa Game Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$60,000	\$120,000	\$120,000
License Fees	\$42,850	\$87,450	\$19,600
Trophy Fees	\$138,700	\$253,470	\$67,000
TALA License	\$1,200	\$2,400	\$1,200
PH License Fees	\$4,000	\$8,000	\$4,000
YEARLY TOTAL	\$246,750	\$471,320	\$211,800
GRAND TOTAL		\$929,870	

Tanzania Bundu Safaris Government Fees			
Items for all Three Areas	2013	2014	2015
Block Fees	\$138,000	\$138,000	\$138,000
License Fees	\$117,300	115,354	\$55,300
Trophy Fees	\$294,600	\$323,760	\$185,490
TALA License	\$2,400	\$3,000	\$2,200
PH License Fees	\$8,000	\$9,000	\$7,000
YEARLY TOTAL	\$560,300	\$589,114	\$387,990
GRAND TOTAL	\$1,537,404		

ANTI- POACHING

Anti- Poaching Approach

The company deploys its own anti-poaching units several times a month in each hunting area. Because company scouts do not have the mandate to arrest, several government game scouts are hired every year by the company to aid in anti-poaching efforts. Each anti-poaching unit is provided a vehicle, food rations, and other equipment to be successful in their patrols. Furthermore, every unit is comprised of five to eight individuals. Most patrols begin by driving along the border of the various areas and finding where poachers have entered. Anti-poaching patrols are conducted year-round.

Poaching in Africa takes many forms. Of the most frequently encountered are meat poaching with weapons and snares, timber poaching, and illegal charcoal burning. Destruction of habitat is just as dangerous to Africa's wildlife as animal poaching. Any and all forms of poaching are viewed as serious offenses and are heavily monitored by the anti-poaching units.

The hunting areas in Tanzania are truly wild and remote locations. The only road networks in place are the ones that are built and maintained by the hunting company. The company dispatches road construction teams several months before the beginning of the hunting season. The company is extremely proud of the fact that since 2013 over 720 kilometers of new roads have been opened. Reopening established roads and opening new roads enables the anti-poaching units to effectively patrol the area and extend the hunting range used by the hunters.

Anti- Poaching Contributions

The companies have vowed a large portion of their income to anti-poaching. This is viewed as an investment rather than an expense.

Three Land Cruisers have been dedicated for anti-poaching purposes. All fuel, maintenance for the vehicles, as well as the wages and food are provided by the company. In 2013, Rungwa Game Safaris funded the engine overhaul of a government anti-poaching vehicle as well. The cost of the overhaul was \$1,250.

In 2014, Rungwa Game Safaris contributed four off road motorbikes to the government anti-poaching units in the Kizigo Game Reserve and Rungwa Game Reserve because navigating the area during the rainy season is difficult. The combined cost of all four motorbikes was \$4,375. The company also donated 7,234 liters of diesel worth \$9,000 to the government anti-poaching units of the Rungwa/Kizigo Game Reserves.

In 2015, the company funded the construction of a bridge spanning a river that proved to be dangerous for the anti-poaching units during the rains. Construction of the bridge allowed the Makawasa Game Post to be open year-round. The total construction cost of the bridge was \$4,418.

The company also contributed \$5,000 to the Tanzania Wildlife Research Institute for pilot training. This contribution helped pay for Captain Anna Titus Laroya to attend a training program at the American Flyers School in Addison, Texas. It is expected this training will help combat poaching through better aerial surveillance.

A complete breakdown of anti-poaching contributions for each company is explained below:

Amounts in USD

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$28,157	\$11,970	\$14,300
Vehicle Repairs	\$6,108	\$3,722	\$3,521
Vehicle Depreciation	\$10,000	\$10,000	\$10,000
Road Opening	\$24,213	\$28,441	\$12,691
Government Anti-Poaching Contributions (described above)	\$1,250	\$13,375	\$9,418
YEARLY TOTAL	\$69,728	\$67,508	\$49,930
GRAND TOTAL		\$187,166	

Amounts in USD

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Anti- Poaching Contributions			
Item	2013	2014	2015
Fuel, Wages, and Food	\$20,179	\$20,788	\$19,945
Vehicle Repair	\$4,088	\$2,852	\$2,891
Vehicle Depreciation	\$5,000	\$5,000	\$5,000
Road Opening	\$10,377	\$9,705	\$10,200
Government Anti-Poaching Contributions	\$1,415	\$617	\$798
YEARLY TOTAL	\$41,059	\$38,962	\$38,834
GRAND TOTAL		\$118,855	

Anti- Poaching Results

The anti-poaching units have made a huge impact in the hunting areas. Over the course of three years over 65 bicycles used by timber and animal poachers have been seized. In addition to this a number of poacher's contraband has been seized including over 40 axes, 30 machetes, and 40 saws. Furthermore, 6 trucks full of illegal timber have been apprehended and commandeered along with other seizures of illegally poached timber in the bush. To navigate during the rainy season and poach for fish, poachers use canoes. To date 40 canoes have been confiscated along with over 150 illegal fishing nets. Since 2013, 45 meat poachers have been arrested with over 650 rounds of ammunition and 13 rifles. Lastly, 75 timber poachers have been arrested.

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROGRAMS

Bore Hole Drilling Projects

Being located in Northern Tanzania, Lolkisale Game Controlled Area, Masai Open Area West, and Mkungunero Game Reserve have members of the Masai tribe living in the areas. Masailand is a very dry region of Tanzania with water in September until the rains in December becomes more and more scarce. The rich Masai culture is centered on their cattle. The cattle and wildlife are competing for water. Without proper measures in place, operating a hunting area amongst the Masai cattle can be a challenge. In order to ease pressure off the natural springs and waterholes, the company has taken on large expenses to drill and

maintain boreholes. The company has reached an agreement with the Masai in the Masailand areas that boreholes are for the exclusive use of the wildlife. This allows the areas to maintain a high population of elephant as well as prey base species such as buffalo, zebra, kudu, and hartebeest.

Two boreholes were successfully drilled and reached water out of seven attempts. Drilling each borehole costs approximately \$22,000. One borehole is located in Lolkisale Game Controlled Area and the other in Masai Open Area West. Water is pumped everyday of the year continuously.

Amounts in USD

Borehole Drilling and Maintenance Expenses (2006- 2015)	
Borehole Item	Amount
Drilling	\$154,000
Water Pumps	\$8,000
Fuel*	\$50,000
Maintenance**	\$30,000
GRAND TOTAL	\$242,000

*Average fuel consumption per water pump is \$2,500 per year for two pumps since 2006.

** Average maintenance costs for the boreholes are \$1,500 per year for two pumps since 2006.

COMMUNITY DEVELOPMENT PROGRAMS

Community Development

Every year, the company meets and exceeds its mandatory \$5,000 area community development fee obligation. Because the company invests directly in the villages and maintains a continuous presence, the villagers understand the important role hunting plays in the daily lives.

Among the company's contributions, which it seeks to increase and improve every year in 2013, the company funded the materials for the construction of a secondary school in Loiborsiret village.

In 2014 in Kimotorok village the company funded the construction of teachers' residence, the purchase of 70 classroom desks, and enough food for the children and teachers for one year. Furthermore, the company funded the construction of laboratories for the secondary schools located in Loiborsiret and Lolkisale villages.

The threat of the lion listing in 2015 had a damaging effect on the company. The company suffered a 50% decrease in safaris compared to

2014. Although the company exceeded 2013 community development funds, it was unable to make the full contributions that it intended. However, with the funds available, another year's worth of food was donated to the Kimotorok school. Also, the company fully funded the construction of a new restroom facility for the primary school in Loiborsiret village. Another Tshs 1,300,000/- was contributed to the Monduli district to build a blood donation center and other projects. A cash contribution was given to the Woman's Welfare Group in the Narakavu village.

In addition to the contributions made by Mr. Brar's companies, American hunters have played a huge role in the villages. Almost every American hunter comes with school and medical supplies, clothes, shoes, and sports equipment. Furthermore, some hunters choose to leave cash that is directly donated to the village schools. Tens of thousands of dollars worth of supplies and cash have been contributed to the villages by American hunters.

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Community Development			
Village	2013	2014	2015
Mwamagembe	Tshs 8,700,000/-	Tshs 4,250,000/-	Tshs 10,800,000/-
Kilumbi	Tshs 6,600,000/-	Tshs 8,500,000/-	-
Kiyombo	Tshs 2,700,000/-	Tshs 4,250,000/-	-
Kivukoni	Tshs 7,800,000/-	Tshs 8,500,000/-	Tshs 5,400,000/-
Lulanga	-	-	Tshs 5,400,000/-
Minepa	-	-	Tshs 10,800,000/-
YEARLY TOTAL	Tshs 25,800,000/- \$16,226	Tshs 25,500,000/- \$15,000	Tshs 32,400,000/- \$17,513
GRAND TOTAL	Tshs 83,700,000/- \$48,739		

Amounts in Tanzania Shillings
Yearly Total and Grand Total conversion calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Community Development			
Village	2013	2014	2015
Loiborsiret	Tshs 16,000,000/-	Tshs 6,000,000/-	Tshs 6,500,000/-
Emboret	Tshs 5,000,000/-	-	-

Mswakini Juu	Tshs 3,000,000/-	-	-
Kimotorok	-	Tshs 124,000,000/-	Tshs 23,400,000/-
Lolkisale	-	Tshs 1,000,000/-	-
Narakavu	-	-	Tshs 2,000,000/-
Gov't Development Funding	-	-	Tshs 1,300,000/-
YEARLY TOTAL	Tshs 29,000,000/- \$18,238	Tshs 131,000,000/- \$77,058	Tshs 33,200,000/- \$17,945
GRAND TOTAL	Tshs 193,000,000/- \$113,241		

Casual Labor Employment

Due to the remoteness of the villages neighboring the hunting areas, villagers are limited in their employment opportunities. Every year the company employs villagers, and helps strengthen the company's relationship with them.

Amounts in Tanzania Shillings

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Rungwa Game Safaris Village Employment Expenses	
Year	Village Employment Expenses
2013	Tshs 19,250,000/- \$12,106
2014	Tshs 26,592,500/- \$15,642
2015	Tshs 28,740,000/- \$15,535
GRAND TOTAL	Tshs 74,582,500 \$43,283

Amounts in Tanzania Shillings

Conversions calculated at exchange rate of Tsh 1590/- to \$1 in 2013, Tsh 1,700/- to \$1 in 2014, and Tsh 1850/- to \$1 in 2015.

Tanzania Bundu Safaris Village Employment Expenses	
Year	Village Employment Expenses
2013	Tshs 22,050,000/- \$13,867
2014	Tshs 23,950,000/- \$14,088
2015	Tshs 24,500,000/-

	\$13,243
GRAND TOTAL	Thsh 70,500,000/- \$41,198

Game Meat Donations

The company maintains a program of contributing game meat to villagers located within and next to the hunting area. An estimated 30% of the total game meat harvested throughout the season is donated to the local communities as well as to the government anti-poaching units. Doing so provides the villagers with a much needed source of protein and discourages indiscriminate meat poaching.

Community Education Programs

Having completed his Bachelor's Degree, Mr. Brar understands the impact that education can have. For this reason the company maintains continuous education programs in the schools surrounding and within the hunting areas. With the aid of school directors and teachers, the company helps conduct lessons that teach the students the importance of wildlife conservation. As explained above, these rural communities rely heavily on company financial and game meat contributions. These lessons help instill in the youth an appreciation and understanding of the wildlife and their habitat. Without hunting companies in these areas these children and families would have no use for the wildlife in the areas and a definite increase in poaching and illegal activity would result.

ADDITIONAL INFORMATION

Sustainable Hunting Management Program

Mr. Brar is very selective when it comes to employing his professional hunters. Only highly experienced professional hunters with a strong ethical and legal approach to hunting are hired. Furthermore, every professional hunter must have a firm knowledge in effective management practices to maintain the longevity of wildlife in the areas. The professional hunters do not take their jobs lightly and understand their role as stewards of wildlife. In the off-season, and when there are breaks in their hunting schedule, the professional hunters offer their expertise and accompany the anti-poaching units.

The company's professional hunters are required to sign a contract that outlines their duties and obligations. The professional hunter contract ensures a sustainable management program by:

- Requiring the professional hunter to know the law and regulations regarding hunting in Tanzania and abide by them;
- Prohibiting the harvest of underweight elephant and hunting an elephant within two kilometers of a National Park boundary;
- Prohibiting the harvest of a male lion under 6 years old;
- Prohibiting the harvest of any immature buffalo;
- Requiring the harvest of only old and mature animals;
- Prohibiting the harvest of any female or pregnant animal; and
- Prohibiting any other illegal or unethical hunting practices.

Violation of the professional hunter contract may result in heavy fines, termination of employment, and referral to the Ministry of Natural Resources and Tourism to revoke their professional hunters license. The companies' sustainable hunting management program supported by their ethical hunting staff enhances prey base species.

To ensure a sustainable off take of prey base species, the company works closely under the advice of its knowledgeable professional hunters with the Ministry of Natural Resources and Tourism to recommend conservative quotas. The company policy is for a minimal off take with selective harvest of only mature males. The low off take is below.

Rungwa Game Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Rungwa Mpera Game Reserve			
2013	Buffalo	20	10
	Eland	4	1
	Hartebeest	8	1
	Hippo	1	0
	Greater Kudu	4	0
	Roan	5	2
	Sable	5	3
	Zebra	10	7
2014	Buffalo	30	11
	Eland	6	1
	Hartebeest	11	3
	Hippo	1	0
	Greater Kudu	7	2
	Roan	7	3
	Sable	7	5
	Zebra	16	7
2015	Buffalo	10	9
	Eland	4	3
	Hartebeest	6	3

	Hippo	1	0
	Greater Kudu	4	2
	Roan	3	2
	Sable	4	2
	Zebra	8	3
Kizigo West Game Reserve			
2014	Buffalo	20	8
	Eland	4	1
	Hartebeest	10	6
	Greater Kudu	4	2
	Roan	5	1
	Sable	5	3
	Zebra	10	6
2015	Buffalo	5	3
	Eland	2	1
	Hartebeest	4	1
	Greater Kudu	2	0
	Roan	2	1
	Sable	2	1
	Zebra	4	0
Selous Game Reserve K1			
2014	Buffalo	15	5
	Eland	2	1
	Hartebeest	10	5
	Hippo	5	2
	Sable	3	1
	Waterbuck	6	2
	Wildebeest	8	1
	Zebra	10	1
2015	Buffalo	10	5
	Eland	1	0
	Hartebeest	4	3
	Hippo	1	0
	Sable	0	0
	Waterbuck	1	0
	Wildebeest	2	1
	Zebra	3	2

Tanzania Bundu Safaris Prey Base Off Take 2013- 2015			
Year	Specie	Quota	Off Take
Lokisale Game Controlled Area			
2013	Buffalo	30	15
	Eland	7	3

	Hartebeest	15	7
	Greater Kudu	4	1
	Lesser Kudu	7	5
	Oryx	7	5
	Wildebeest	15	11
	Zebra	20	16
2014	Buffalo	35	25
	Eland	7	4
	Hartebeest	15	11
	Greater Kudu	5	4
	Lesser Kudu	7	6
	Oryx	8	6
	Wildebeest	20	11
	Zebra	30	17
2015	Buffalo	8	6
	Eland	4	1
	Hartebeest	6	4
	Greater Kudu	4	2
	Lesser Kudu	3	1
	Oryx	4	2
	Wildebeest	10	5
	Zebra	8	4
Masai Open Area West			
2013	Buffalo	30	17
	Eland	8	2
	Hartebeest	15	8
	Greater Kudu	5	3
	Lesser Kudu	7	4
	Oryx	7	5
	Wildebeest	15	10
	Zebra	20	13
2014	Buffalo	35	23
	Eland	8	5
	Hartebeest	15	9
	Greater Kudu	6	5
	Lesser Kudu	7	5
	Oryx	7	5
	Wildebeest	20	9
	Zebra	25	16
2015	Buffalo	25	20
	Eland	5	1
	Hartebeest	10	6
	Greater Kudu	5	2

	Lesser Kudu	3	2
	Oryx	5	3
	Wildebeest	15	8
	Zebra	15	6
Mkungunero Game Reserve			
2013	Buffalo	1	1
	Eland	1	0
	Hartebeest	1	0
	Greater Kudu	1	0
	Lesser Kudu	1	1
	Oryx	7	0
	Wildebeest	1	0
	Zebra	1	1
2014	Buffalo	8	8
	Eland	3	0
	Hartebeest	5	2
	Greater Kudu	2	2
	Lesser Kudu	4	3
	Oryx	2	1
	Wildebeest	5	1
	Zebra	1	0
2015	Buffalo	3	3
	Eland	1	0
	Hartebeest	3	0
	Greater Kudu	1	1
	Lesser Kudu	2	1
	Oryx	1	1
	Wildebeest	3	1
	Zebra	3	2

Sustainable Lion Hunting Management Program

The company has in place several measures to ensure the sustainable off take of lion in each hunting area. The professional hunter contract requires proper selection of hunted lion. Under no circumstances may a male lion under 6 years old be harvested. Doing so results in a fine of \$20,000 along with the government fines. It is also absolutely prohibited for any lioness to be hunted and no male lion in a pride may be harvested.

Male lion are known to leave their pride to patrol their range. So that a pride male lion is not harvested, the company maintains a lion record. Professional hunters are provided with trail cameras. Trail camera pictures are compiled and entered into the record and the professional

hunters use this record when evaluating huntable lion to avoid underage and pride males. The company's limited off take illustrates their careful selection. Mr. Brar and the professional hunters are confident that each area can sustain the yearly lion off take due to continuous record keeping, lion density, size of the areas, and strong prey base population.

Rungwa Game Safaris Lion Off Take 2013- 2015		
Year	Lion Quota	Lion Off Take
Rungwa Mpera Game Reserve-2,064 Square Kilometers		
2013	4	2
2014	3	1
2015	3	1
AREA TOTAL	10	4
Kizigo West Game Reserve-1,288 Square Kilometers		
2014	3	0
2015	3	2
AREA TOTAL	6	2
Selous Game Reserve K1-332 Square Kilometers		
2014	1	0
2015	1	0
AREA TOTAL	3	0
GRAND TOTAL	22	6

Tanzania Bundu Safaris Lion Off Take 2013- 2015		
Year	Lion Quota	Lion Off Take
Lokisale Game Controlled Area-1,082 Square Kilometers		
2013	4	0
2014	2	0
2015	1	0
AREA TOTAL	7	0
Masai Open Area West-985 Square Kilometers		
2013	4	0
2014	2	0
2015	2	0
AREA TOTAL	8	0
Mkungunero Game Reserve-767 Square Kilometers		
2013	0	0
2014	2	0
2015	1	0
AREA TOTAL	3	0
GRAND TOTAL	18	0

Human Lion Deterrent Agreements

Cattle are an easy source of food for lion in the Masailand areas. Many Masai view lion as a threat to their cattle. However, in order to prevent retaliatory killings against lion, the company has established a system of compensating the Masai for any lost cattle to lion. Since 2010, a total of \$7,500 has been paid directly to herdsman for lost cattle. This compensation system has proven effective at deterring retaliatory killings.

American Hunters

The charts below demonstrate the large role that American hunters play in the company's clientele base as well as the sharp decline in American clients:

Table 1: Rungwa Game Safaris American Hunters 2013- 2015

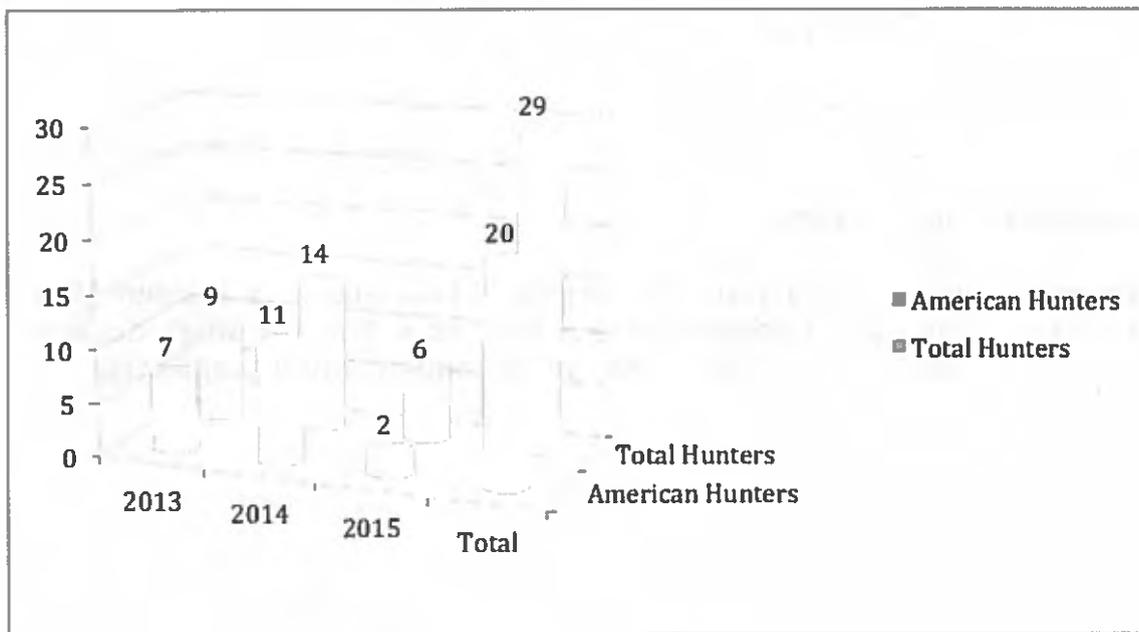
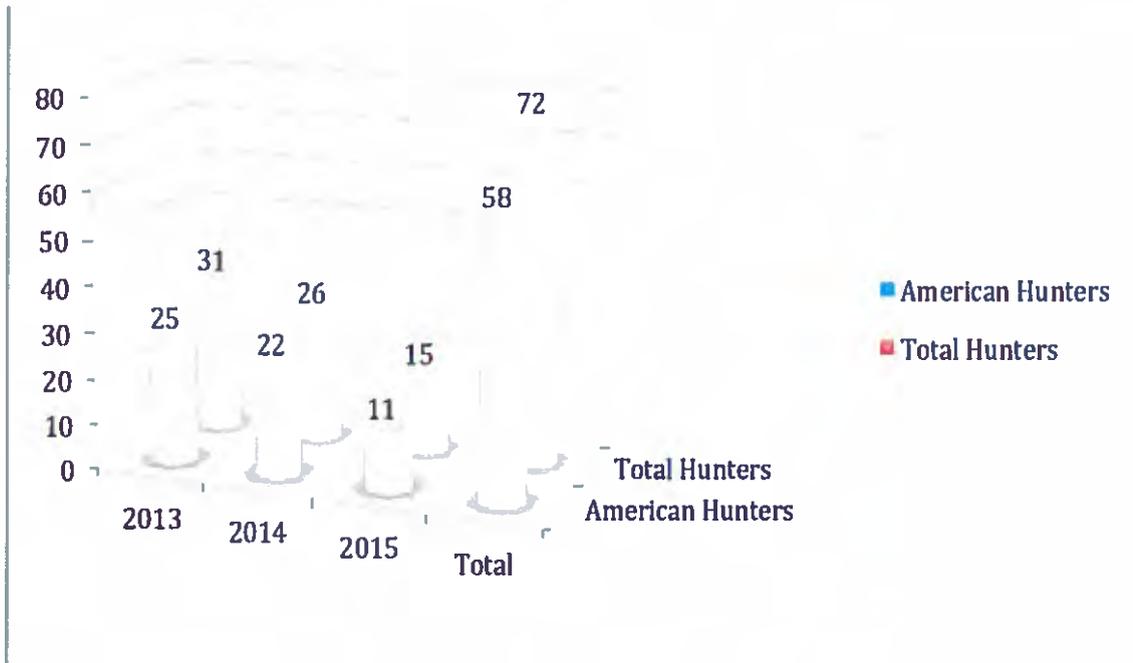


Table 2: Tanzania Bundu Safaris American Hunters 2013- 2015



American Lion Hunters

The below charts demonstrate the large role that American hunters play in the company's lion hunting clientele base as well as the sharp decline in American clients as a result of the threat and eventual lion listing:

Table 3: Rungwa Game Safaris American Lion Hunters 2013- 2015

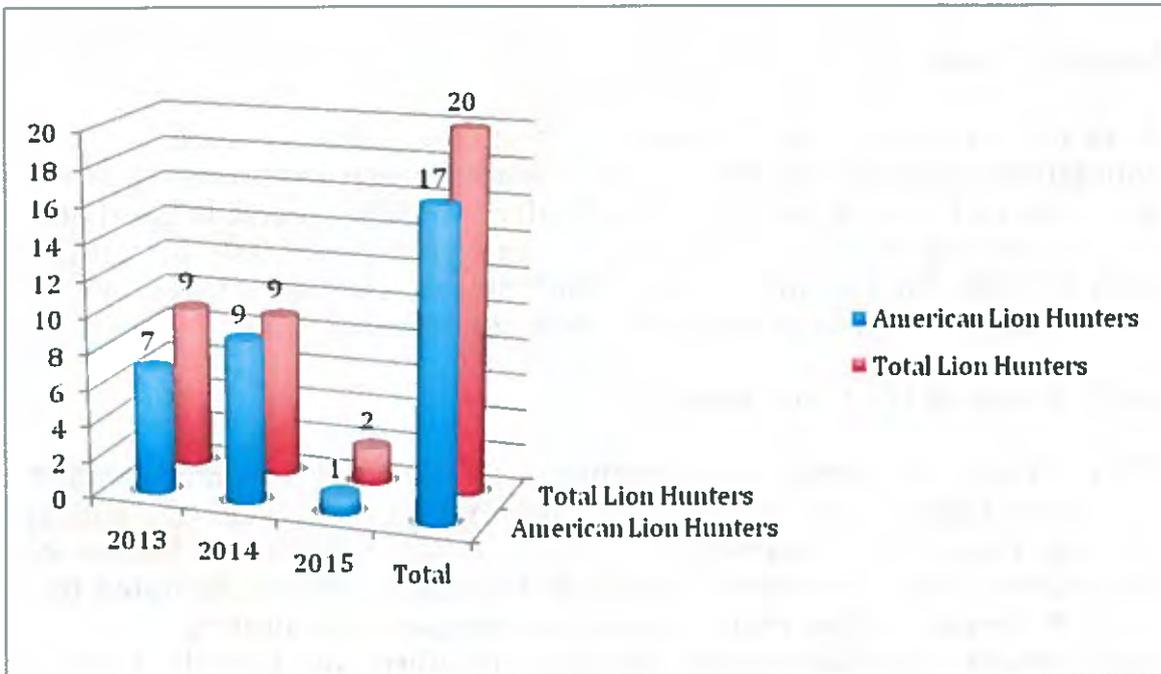
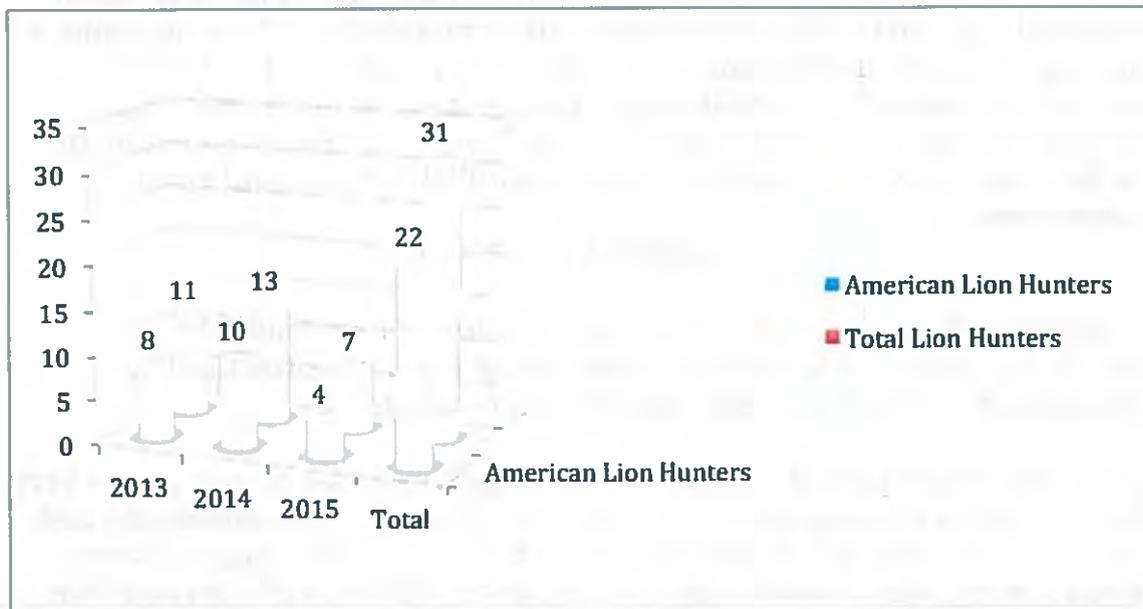


Table 4: Tanzania Bundu Safaris American Lion Hunters 2013- 2015



Exported Lion

Since 2013, six male lion were successfully harvested. The company is proud to report that all lion harvested in 2013 and 2014 were exported in

compliance with Tanzanian law and regulations. The company is still awaiting the aging results of the lion harvested in 2015, but expects they will comply.

Leopard Status

All of the company's hunting areas are home to healthy leopard populations. Leopard are easily able to adapt to their environment and seek various forms of prey. Even in the dry Masailand areas, leopard are found in strong numbers. The compensation agreement with the Masai for lost cattle due to lion is in place for lost goat and sheep taken by leopard, which reduces the risk of retaliatory killings.

Implications of the Lion Listing

After a financially burdensome hunting season in 2015, Mr. Brar decided to transfer Selous Game Reserve K1 to another reputable and upstanding hunting company. Mr. Brar refuses to sacrifice the wildlife and habitat in his hunting areas. Therefore, due to the decrease in safaris, he opted to transfer the area rather than cut anti-poaching and community development contributions. The decrease in safaris was a result of the fear American hunters felt towards a potential regulation on the importation of lion. This fear came to fruition at the end of 2015 with the lion listing. As a consequence of the listing, three lion hunts have been cancelled and currently no lion hunts are scheduled for 2016. Running a hunting company in Tanzania is a very costly endeavor. The loss of revenue because of the lion listing is damaging not only to Mr. Brar's companies, but all hunting companies in Tanzania. The true victims of the lion listing are Tanzania's precious wildlife, habitat, and rural communities.

CONCLUSION

Company policy and practice provides for lion enhancement by specifically addressing the three main threats to lion: prey base degradation, habitat loss, and human lion conflict.

The professional hunter contract requires professional hunters to be very selective when hunting prey base specie such as buffalo, wildebeest and zebra. Only mature males may be hunted. The lion prey base is further supported by the company practice of creating biologically responsible quotas and off take based on the density of each specie in the hunting area. Furthermore, the anti-poaching units are making huge strides in their fight against poaching and serve as a serious deterrent to poaching. By drilling boreholes exclusively for the wildlife, a great deal of pressure is taken off species such as buffalo in their search of water. The

classroom education programs regarding hunting as a conservation tool teaches the students the negative impacts that poaching plays and how hunting plays a beneficial role in their daily lives. Lastly, the continuous game meat contributions serve as an active deterrent to meat poaching. The prey base species in the hunting areas continue to flourish and increase in number.

The company provides for the protection of habitat and reduces habitat loss. The anti-poaching teams treat timber poaching and illegal charcoal burning just as seriously as meat poaching. The units have had great success in seizing illegal timber and illegal timber contraband as well as destroying charcoal burning kilns. The boreholes also serve as tools for habitat protection as they have taken a great deal of pressure off the natural springs and waterholes.

Mr. Brar has specifically addressed the threat of human lion conflict by establishing agreements in the Masailand areas whereby cattle killed by lion are reimbursed their full market value. These agreements have been very effective at handling potential human lion conflict.

APPENDIX

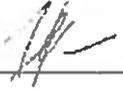
Rungwa Game Safaris and Tanzania Bundu Safaris		
No.	Title	Remark
1	Rungwa Game Safaris and Tanzania Bundu Safaris map of hunting areas	
2	Rungwa Game Safaris "Performance Evaluation" letter	From Ministry of Natural Resources and Tourism
3	Rungwa Game Safaris cover letter for 2013-2015 "Performance Evaluation" report	Sent to Director of Wildlife
4	Rungwa Game Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
5	Rungwa Game Safaris cover letter for 2014 performance update	Sent to Director of Wildlife
6	Rungwa Game Safaris cover letter for 2015 performance update	Sent to Director of Wildlife
7	Tanzania Bundu Safaris Performance Evaluation letter	From Ministry of Natural Resources and Tourism
8	Tanzania Bundu Safaris cover letter for 2013-2015 "Performance Evaluation" report	Sent to Director of Wildlife
9	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
10	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
11	Tanzania Bundu Safaris cover letter for 2013 performance update	Sent to Director of Wildlife
12	Rungwa Game Safaris Government Anti-Poaching Contributions	2013-2015
13	Rungwa Game Safaris Anti-Poaching Vehicle Repair Expenses	2013-2015
14	Rungwa Game Safaris Anti-Poaching Fuel Expenses	2013-2015
15	Rungwa Game Safaris Anti-Poaching Wages and Food	2013-2015
16	Rungwa Game Safaris Anti-Poaching Reports	
17	Tanzania Bundu Safaris Government Anti-Poaching Contributions	2014 & 2015
18	Tanzania Bundu Safaris Anti-Poaching Vehicle Repair Expenses	2013-2015
19	Tanzania Bundu Safaris Anti-Poaching Vehicle	2013-2015

	Fuel Expenses	
20	Tanzania Bundu Safaris Anti-Poaching Wages and Food Expenses	2013-2015
21	Tanzania Bundu Safaris Anti-Poaching Reports	
22	Anti-Poaching and Illegal Timber Photos	
23	Rungwa Game Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgment	2013-2015
24	Tanzania Bundu Safaris Community Development Bank Transfers, Receipts, and Letters of Acknowledgement	2013-2015
25	Community Development Photos	
26	Rungwa Game Safaris & Tanzania Bundu Safaris Professional Hunter Contracts	
27	Rungwa Game Safaris Allocated Quota	2013-2015
28	Tanzania Bundu Safaris Allocated Quota	2013-2015
29	Prey Base and Wildlife Photos	From Company Hunting Areas
30	Lion Photos	From Company Hunting Areas
31	"Custodians of Wilderness" Film	On file with United States Fish and Wildlife Service

Name: Harpreet Brar

Position Held: Owner and Managing Director

Company Names: Rungwa Game Safaris & Tanzania Bundu Safaris

Signature:  _____

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US Fish & Wildlife Service

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(b) (6)



Permit Number: MA25027C-0
Effective: 09/01/2017 Expires: 08/31/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803



CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHRISTOPHER (b) (6) MANION
(b) (6)
ANCHORAGE, AK (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539(a); 50 CFR 17.40(r).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in South Africa for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. Trophy must have been taken during the 2017 hunting season in Kalahari Oryx Private Game Reserve, Northern Cape Province.
- D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2017 season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit/re-export certificate, source code "W", issued by the Management Authority of the exporting/re-exporting country.
- F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).



Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES Threatened-listed
(Appendix I of CITES and/or ESA) lion

MAR - 7 2017 LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name Markl	1.b. First name Edward	1.c. Middle name/initial (b) (6)	1.d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	2. Social Security No. (b) (6)	3. Occupation (b) (6)	5. Affiliation/ Doing business as (see instructions) N/A
6.a. Telephone number (b) (6)	6.b. Alternate telephone number (b) (6)	6.c. Fax number (b) (6)	6.d. E-mail address (b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Decatur	1.c. State Texas	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US198409/9 No <input type="checkbox"/>
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures)	
Date of signature (mm/dd/yyyy) 01/30/2017	

Please continue to next page



E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Note 1: If you hold an import permit for trophy/trophies that you did not use, please return the unused original permit. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
 - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
P. l. melanochaita (African lion)
 - b. Sex (if known).
Male
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
Tanzania Rungwa Game Reserve block Rungwa East
Selous Game Reserve block MHT 3
 - b. Date wildlife is to be hunted:
July 1st to 30th, 2017
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
N/A
 - b. Date wildlife was hunted:

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
All parts including skin, skull, teeth, and claws
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: *Coppersmith Global Logistics is agent.*
 Business Name: *Shipper in Tanzania is*
 Address: *Bushman Hunting Services Limited*
 City: *Plot No. 9-14, Block C, Msamvu Industrial Ar*
 State/Province: *P.O. Box 678*
 Country, Postal Code: *Morogoro, Tanzania*

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information provided by Conservation Force and Tanzanian authorities and operators.
 CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. ~~If you are a broker or taxidermist applying on behalf of a foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.~~

~~I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.~~

~~Taxidermist/Broker's signature: _____ Date: _____~~

7. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:  Date: *01/30/2017*

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

John J. Jackson, III or Regina Lennox of Conservation Force
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: 

Name: EDWARD  MARKL 

Date: 30 January 2017

**PRIVILEGED, PROPRIETARY,
CONFIDENTIAL INFORMATION**

NOT FOR PUBLIC RELEASE



**Plot No. 61-64; Block 'E' Kihonda Industrial Complex,
P. O. Box 678 Morogoro, TANZANIA.
Email: info@bushmanhunting.com
Website: www.bushmanhunting.com**

RE: Operator Enhancement Report

DESCRIPTION OF COMPANY

Bushman Hunting Safaris Limited is a private company established by local Tanzanian hunters in 2009. Talal Abood is the owner and Managing Director of the company. He is a dedicated hunter and conservationist with a strong belief in wildlife and habitat conservation through sustainable hunting practices. Under his direction, the company has grown into one of Tanzania's premier hunting outfitters, providing top quality safaris in the country's prime hunting areas.

The company employs five professional hunters, ten game trackers, fifty-five camp staff, and six administrative personnel. Depending on the hunting area, 10%-15% of the full-time staff are members of neighboring villages. In addition, before and throughout the hunting season the company employs numerous individuals from surrounding villages for various tasks and projects. To further engage local communities, various community development and educational programs have been established for neighboring villages.

In conjunction with company professional hunters, area managers, and government project managers, each area has an anti-poaching program.

In August of 2015, Bushman Hunting Safaris Limited received a letter from the Ministry of Natural Resources and Tourism commending its outstanding performance as a hunting outfitter. The criteria for the performance letter was the utilization of allocated quotas, payment of government levies, compliance with hunting laws and regulations, anti-poaching efforts, and community assistance.

By maintaining the current high performance, the company is pre-qualified for renewal of the currently allocated hunting areas.

DESCRIPTION OF CONCESSIONS

In 2013, the Ministry of Natural Resources and Tourism allocated three blocks to the company for the 2013-2018 term: Rungwa Rungwa East Game Reserve, Maswa Game Reserve North, and Selous Game Reserve MHJ3. Each area offers a diverse topography, array of species, and quality hunting experience for clients.

Rungwa Rungwa East Game Reserve

The Rungwa Rungwa East Game Reserve borders the Ruaha National Park to the North. The hunting block is 1,370 square kilometers with a well established road network throughout. The area boasts a dense lion population as well as countless herds of buffalo. It is not uncommon to have over 20 different male lion on bait during the period of lion safaris. Species such as leopard, elephant, eland, sable, roan, zebra, greater kudu, reedbuck, bushbuck, klipspringer, bush pig, warthog, hyena, elephant, hippo, and crocodile are plentiful in the area.

Maswa Game Reserve North

Maswa Game Reserve North is one of the best hunting locations in the world. The area is 751 square kilometers. Bordering the South Western part of the Serengeti it plays a crucial role as a buffer area to poachers and cattle herders. The area acts as a dry season refuge for many animals in the Serengeti. The Maswa area harbors the internationally known wildebeest migration and throughout the year is home to thousands of animals. Common species include Thompsons's Gazelle, wildebeest, zebra, impala, roan, eland, buffalo, topi, elephant, leopard, and lion. The lion population in the area is high due to the abundance of prey base animals and suitable habitat.

Selous Game Reserve Block MHJ3

The Selous Game Reserve is the largest game reserve in the world. The block is 1,147 square kilometers and is located in the South East part of the reserve. It is comprised of rolling savannah woodland, grassland plains, and rocky outcrops. Some of the largest rivers in Tanzania flow through the Selous. The concession

has a high density of prey base species such as hippo, buffalo, eland, and wildebeest supporting a healthy lion population.

GOVERNMENT FEES

From 2013-2015, the company has paid a total of \$1,998,282 in government fees for all three concessions. Government fees are directly correlated to the company's revenue. This sum is comprised of block fees, game fees, hunting permits, gun permits, withholding tax, VAT, PAYE and SDL tax. This amount has assisted the government to meet its development plans particularly in the protection and conservation of wildlife. The large drop in 2015 was a result of a reduced demand for lion safaris by the American hunting market.

Amounts in USD

Particulars for all Three Areas	2013	2014	2015
Block Fees	\$150,000	\$150,000	\$150,000
Game Fees	\$402,800	\$355,518	\$255,080
Hunting Permits	\$167,054	\$140,250	\$110,350
Gun Permits	\$6,120	\$5,760	\$3,022
Business License and Gov't Fees	\$4,462	\$12,050	\$13,105
Withholding Tax	\$7,163	\$5,881	\$4,032
VAT	\$17,357	\$21,356	\$10,100
PAYE and SDL	\$2,055	\$2,160	\$2,607
TOTAL PER YEAR	\$757,011	\$692,975	\$548,296
GRAND TOTAL	\$1,998,282		

ANTI-POACHING COMPONENT

Anti-Poaching Activities

The company uses government anti-poaching scouts in collaboration with its own scouts and staff to form each anti-poaching unit. Anti-poaching units are used and deployed in all three hunting areas. Likewise, the company has engaged three anti-poaching experts who assist anti-poaching units. Each anti-poaching unit is comprised of five to seven individuals. The anti-poaching units patrol the sensitive boundaries of the hunting blocks on foot and by using motorcycles and vehicles. Patrols are conducted multiple times a month for several days at a time.

The anti-poaching units are trained by experienced government scouts as well as by company professional hunters with years of anti-poaching experience. Each unit is equipped with firearms, vehicles, camping equipment, radios, satellite phones, GPS, and cameras provided by the company. The anti-poaching units are making a significant difference in deterring, preventing, and prosecuting poaching. In the off-season, the company maintains financial and ground support to the anti-poaching teams. This enables year-round protection of the wildlife and habitat.

Anti-poaching units are trained to deal with the use of rifles, spears, poison arrows, snares, and trained poaching dogs, fish poaching, timber poaching, and hardwood charcoal burning. All incidents regarding the destruction of wildlife or habitat are taken seriously and fully prosecuted.

The company has established a strong informant network in the villages through a system of compensating cooperative village informants for information leading to an arrest or seizure.

Upon entering the newly allocated concessions in 2013, the company realized the need for a much more advanced and extended road network. Road building crews are sent out months before the start of the hunting season to maintain, rebuild, and extend the road network, which enables the anti-poaching teams to reach all parts of the hunting area.

Anti-Poaching Contributions

Bushman financially supports a collaborative anti-poaching program involving its own staff and government anti-poaching scouts.

In the course of implementing the anti-poaching operations, the company provides a Land Cruiser to each hunting area. The vehicles are used full-time under the administration of the Game Reserve Managers. The company pays for all maintenance and fuel expenses for the vehicles. To reach inaccessible parts of the hunting areas, two motorcycles were donated to the Maswa Game Reserve. In 2015, Bushman rented a helicopter to conduct anti-poaching operations. Using the helicopter allowed for increased surveillance coverage and is surely a method that will be used in the future.

In 2015 the company paid a sum of \$10,000 for the rehabilitation of government anti-poaching camps used by the teams. The company contributed the following equipment to address requests made by government Game Reserve anti-poaching units:

- **Maswa:**
 - 2 Motorcycles worth.....\$3,200
 - 2 Garmin GPS devices worth.....\$1,100
 - 2 HF Radios with complete parts worth.....\$7,000
 - 2 Digital Cameras worth.....\$800
 - 1 Desktop computer worth.....\$1,000
 - 1 Generator.....\$1,200
- **Rungwa:**
 - 2 HF Radios worth.....\$4,400
 - 3 GPS devices worth.....\$1,650
- **Selous:**
 - 20 GPS devices worth.....\$11,000
- **GRAND TOTAL.....\$31,350**

The company's anti-poaching contributions are detailed below along with the results enabled by these contributions that include the arrests of 22 poachers.

Amounts in USD

Amount Spent on Anti-Poaching Activities (2013-2015)				
Particulars	2013	2014	2015	Total
Salaries and Wages	\$13,400	\$13,900	\$14,055	\$41,355
Fuel Expenses and Donations	\$8,265	\$9,006	\$9,723	\$26,994
Anti-Poaching Facilitation Contributions	\$1,500	-	\$1,500	\$3,000
Helicopter Rental Fee	-	-	\$14,500	\$14,500
Road and Air Strip Repair	\$11,000	\$10,500	\$10,500	\$32,000

Rehabilitation of Government Anti-Poaching Camps	-	-	\$10,000	\$10,000
Anti-Poaching Equipment Contributions (see above chart)	-	-	\$31,350	\$31,350
Value Depreciation of Anti-Poaching Vehicles	\$15,000	\$15,000	\$15,000	\$45,000
Anti-Poaching Units General Equipment Resupply	-	-	\$7,320	\$7,320
TOTAL	\$49,165	\$48,406	\$113,948	\$211,519

Results of Anti-Poaching Operations

Bushman Hunting Safaris Anti-Poaching Results 2013-2015	
Item	Quantity Seized
Snares	2,500
Machetes	48
Knives	52
Axes	30
Spear	26
Motorcycles	5
Bicycles	28

Bushman Hunting Safaris Poacher Arrests 2013-2015		
Date of Arrest	Case Number	Names of Poachers Arrested
25/5/2013	BAR/RB/1090/2013	John Ngitile
27/06/2013	BAR/RB/888/2013	Ras John
03/07/2013	BAR/RB/1415/2013	Kulwa Limbu, Magulu Kirungu, Keleja Limbu, Mahusi Sirima, and Marco Sindha
29/07/2013	BAR/IR/1639/2013	Charles Kanyege and Msanja Limbu
23/06/2014	IR/948/2014- RB/1446/2014	Gingi Mlyangeni and Matuba Mg'hindhi
16/07/2014	BAR/IR/1085/2014	Buluda Kibinza and Kadole Jitabusu
18/09/2015	BAR/RB/2707/2015	Mabula Malale, Lameck Masuka, and Kulwa Gasisi
23/09/2015	BAR/RB/2739/2015	Isonga Sariko, Sobia Nyara, Malenga Semba, Lusingi Nyedo, and Maduhu Lusingi
TOTAL ARRESTED		22

HABITAT PROTECTION AND CONSERVATION DEVELOPMENT PROJECTS

Community Education

Bushman Hunting Safaris Limited has sponsored several community educational workshops in the neighboring villages. Government anti-poaching scouts and project managers conduct the workshops. The purpose of the workshops is to educate the villagers regarding the importance of protecting wildlife and their habitat. Specifically, the workshops work to accomplish and educate on the following: the long term dangers and damage of cattle herding in wildlife habitat; the long term dangers and damage of poaching and illegal charcoal

burning; the role hunting plays as a sustainable conservation tool; and maintaining continuous and positive presence in the surrounding villages.

Cattle Herder Operations

The Serengeti National Park and Maswa Game Reserve are among the most important and pristine ecological areas in the world. One large threat facing both is the encroachment of cattle herders into the areas. By law, no person is allowed to enter a game reserve or national park without proper documentation and no cattle under any conditions. But, in the Maswa-Serengeti region, members of the Wasukuma tribe attempt enter the area with a large number of cattle. They have over-cultivated their farmland and largely eliminated their former grazing pastures. The herdsman attempt to graze their cattle in the Reserve and National Park. Due to the location and quality of grass, the herdsman risk heavy fines and impoundment of their cattle.

The Maswa Game Reserve serves as the first line of defense to cattle and human encroachment. The company and government scouts conduct many patrols and constant monitoring year-round to prevent this encroachment. Once the cattle have been located, they are taken to the game post where they are impounded. Only upon payment of the fine will the cattle be released to their owner This habitat protection project has been successful in curbing cattle numbers and preserving the quality of the ecosystem.

Fines in Tanzania Shillings

Year	Number of Cattle Impounded	Number of Cattle Herders Fined	Fines Paid by Cattle Herders
2013*	16,505	55	Tsh 33,510,000/-
2014	19,657	288	Tsh 135,450,000/-
2015**	5,721	108	Tsh 42,000,000/-
2016***	700	7	Tsh 5,800,000/-

*For the months of April, May, and June 2013.

**For the months of January, March, July, August, September, October, November, and December 2015.

***For the months of January, February, and March 2016.

COMMUNITY PARTICIPATION

Community Assistance

Bushman Hunting Safaris Limited is devoted to working hand in hand with the surrounding villages. The company contributes directly to the villages through cash contributions of at least \$20,000 per year. This has helped maintain quality relations between the company and neighboring villages. Furthermore, direct contributions to the villages acts as an incentive to deter poachers and other illegal behavior in fear of losing future contributions.

All contributions are properly documented and monitored. Villages are required to send a letter acknowledging receipt of the contribution as well as an agenda for the use of the funds. Through its contributions, the company is proud to have supported projects such as constructing two medicine dispensaries, constructing multiple classrooms and housing for teachers, repairing village water wells, providing health care insurance, and addressing other various requests to improve the quality of life in the local villages. In addition to direct financial contributions, the company has contributed school and classroom supplies.

Hunting clients independently and voluntarily contribute greatly to the villages as well. Many of them come with duffel bags full of clothes, shoes, school supplies, soccer balls, and medical equipment. Additionally, some clients choose to give money directly to schools in the villages. These donations have introduced thousands of dollars to the impoverished villages.

An accounting of the company's community contributions is below and does not incorporate the additional client contributions.

2013 Community Participation Contributions		
Village	Amount	Purpose
Barikwa	\$5,000	Village development projects
Mwauchumu	\$2,500	Classroom construction
Longalombogo	\$2,500	School rehabilitation
Kinyika	\$2,500	School rehabilitation
Kisanga	\$2,500	School rehabilitation
Makale	\$5,000	Classroom construction
TOTAL	\$20,000	

2014 Community Participation Contributions		
Village	Amount	Purpose
Mwasinasi	\$2,500	Classroom construction
Lung'wu	\$2,500	Medicine dispensary construction
Kikulyungu	\$5,000	Village development projects
Makale	\$2,500	Village development projects
Chinugulu	\$2,500	Village development projects
Maperamengi	\$5,000	Village development projects
TOTAL	\$20,000	

2015 Community Participation Contributions		
Village	Amount	Purpose
Damidami	\$5,000	Classroom construction
Kikulyungu	\$5,000	Reconstruction of water well and health insurance for villagers
Sasilo	\$2,500	Village development projects
Chisingisa	\$2,500	Village development projects
Kinyika	\$2,500	Village development projects
Kisanga	\$2,500	Village development projects
TOTAL	\$20,000	

Game Meat Contributions

Being owned and managed by local Tanzanians, the company recognizes the severe poverty and protein malnutrition experienced by many people living in rural areas. The company has an agreement with the surrounding villages to donate 50% of the game meat harvested throughout the season to them. The agreement both improves nutrition and acts as a deterrent for villagers from meat poaching.

Animal Conflict Control

As per company policy, the company collects reports from villages in respect to problem animals. It is the responsibility of the company's professional hunters

and rangers to keep wildlife out of community farms during harvest periods and address any human or livestock conflicts with lion and other predators. This agreement has been formed due to the company's personal corporate social responsibility practice.

The company has a standing agreement with neighboring communities to compensate them for any livestock lost to lions and other predators. This agreement serves to act as a deterrent to retaliatory lion killing.

In addition, the company conducts regular educational courses in the local communities on how to defend against crop raiding animals. In 2015, the anti-poaching teams received 15 reports of lion and livestock conflict as well as crop raiding animals. The company is proud to report no lions have been killed as a result of retaliation from livestock losses, and the communities have been successful in driving out wild animals without loss of crop, animal injury, or human injury.

OTHER INFORMATION

Hunting Regulations

All of the company's professional hunters are obligated by contract to adhere to Tanzania's Wildlife Regulations or face termination of employment and potential loss of their professional hunters' licenses. The hunting regulations and the company policy support a true fair chase hunt and longevity of the wildlife within the hunting areas.

Company Sustainable Hunting Practices

All company professional hunters are highly trained and experienced. Each professional hunter has over 15 years of professional hunting experience. The professional hunters maintain the highest ethical hunting standards in keeping with the company's own standards. Each professional hunter working for the company must sign a contract with the company that outlines the ethical practices, management program, and the regulatory standards with which they must comply.

Furthermore, a strict management program of only harvesting mature male species supports the longevity and quality of the hunting areas and its wildlife. The company works closely with the Ministry of Natural Resources and Tourism to create a sustainable and conservative quota for each hunting area. The yearly quotas and the company policy of only harvesting mature males ensures the protection of the lion's prey base.

Bushman Hunting Safaris Prey Base Off Take 2013-2015			
Year	Specie	Allocated Quota	Off Take
Rungwa Rungwa East Game Reserve			
2013	Buffalo	30	13
	Eland	7	3
	Hartebeest	18	0
	Hippo	8	4
	Roan	8	2
	Sable	6	1
	Waterbuck	8	2
	Zebra	18	6
2014	Buffalo	30	9
	Eland	7	3
	Hartebeest	18	3
	Hippo	8	3
	Roan	8	1
	Sable	6	1
	Waterbuck	8	0
	Zebra	18	6
2015	Buffalo	30	12
	Eland	4	1
	Hartebeest	6	3
	Hippo	8	3
	Roan	8	1
	Sable	6	0
	Waterbuck	8	3
	Zebra	19	2
Maswa Game Reserve North			
2013	Buffalo	40	39
	Eland	7	3

	Hartebeest	24	6
	Roan	8	7
	Topi	20	18
	Waterbuck	16	9
	Wildebeest	26	14
	Zebra	26	18
2014	Buffalo	40	32
	Eland	12	5
	Hartebeest	24	8
	Roan	10	4
	Topi	26	14
	Waterbuck	13	6
	Wildebeest	26	15
	Zebra	26	17
2015	Buffalo	50	13
	Eland	14	0
	Hartebeest	24	5
	Roan	10	2
	Topi	30	5
	Waterbuck	13	1
	Wildebeest	30	4
	Zebra	30	6
Selous Game Reserve MHJ3			
2013	Buffalo	30	5
	Eland	8	4
	Hartebeest	18	5
	Hippo	8	6
	Sable	4	3
	Waterbuck	8	4
	Wildebeest	15	3
	Zebra	18	5
2014	Buffalo	30	6
	Eland	8	1
	Hartebeest	18	4
	Hippo	8	3
	Sable	5	2

	Waterbuck	8	1
	Wildebeest	15	4
	Zebra	18	3
2015	Buffalo	30	17
	Eland	4	5
	Hartebeest	7	5
	Hippo	8	3
	Sable	5	3
	Waterbuck	8	4
	Wildebeest	15	9
	Zebra	18	8

Company Sustainable Lion Hunting Practices

In accordance with Tanzania's hunting regulations, the company only allows lions six years of age and older to be harvested. In Maswa Game Reserve North, the company has instituted a mandatory age restriction of lion seven years of age and older. The company has implemented this policy as male lion estimated to be six years of age have been seen in prides with cubs. This is a result of the unique Serengeti ecosystem in which these lion live. In addition, the company does not allow for any male lion that is in a pride to be harvested during a hunt. The company's robust lion monitoring program in each area, create the condition that when a lion is harvested, he is of proper age and not in a pride. The company professional hunter contracts include the above lion hunting practices.

Bushman Hunting Safaris Lion Off Take 2013-2015	
Year	Lion Off Take
Rungwa Rungwa East Game Reserve	
2013	3
2014	1
2015	2
AREA TOTAL	6
Maswa Game Reserve North	
2013	4
2014	1
2015	0
AREA TOTAL	5

Selous Game Reserve MHJ3	
2013	1
2014	0
2015	2
AREA TOTAL	3
GRAND TOTAL	14

Lion Monitoring Practice

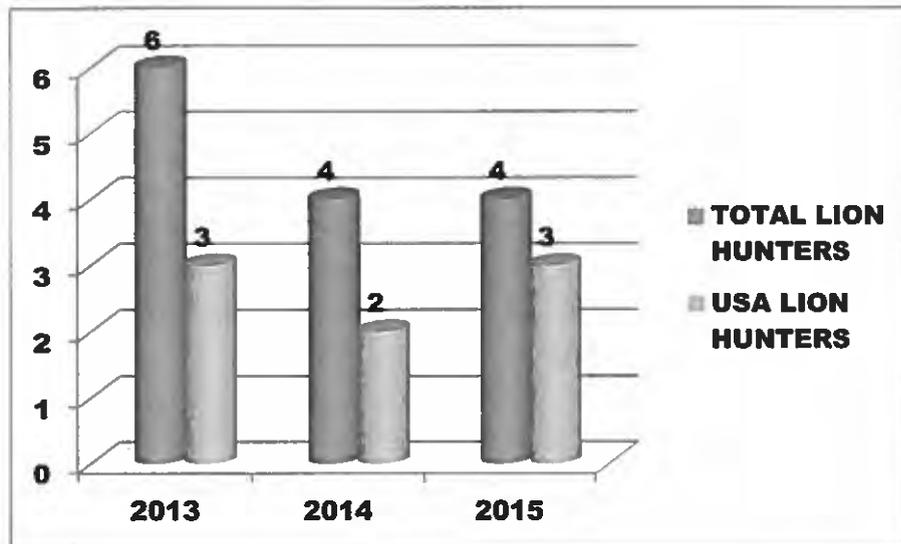
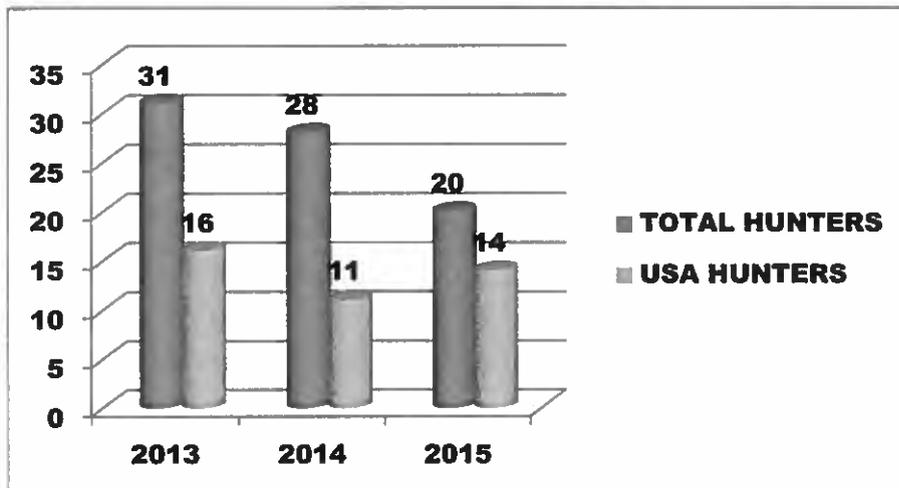
The use of game cameras has enabled the company to monitor, identify, and age lions in its hunting areas. All professional hunters are provided with game cameras and are required to submit pictures for the company database. It has become company policy for outgoing and incoming professional hunters to leave reports on the various lions coming to bait. Furthermore, lion encounters and any baits that have been "hit" by lions are entered into each camp's GPS. Because the professional hunters are familiar with lion in the areas and able to identify them through the photo database, the professional hunters can spot and hunt only non-pride male lions.

Lion Exports

Since 2013, company clients have successfully harvested 14 lion across the three concessions. The lion taken in 2015 have not yet been aged and thus have not yet been exported, but it is expected due to the use of cameras, the professional hunters' skill, and company policy that the 2015 lion will also be exported. However, the company is proud and happy to report that all lions from the 2013 and 2014 hunting season were successfully exported according to Tanzanian law and all applicable hunting regulations.

American Hunting Market

Hunters from the United States make up the majority of Bushman Hunting Safaris' clientele. Furthermore, 50% of the company's lion hunters from 2013-2015 have been Americans. Without the revenue from American lion hunters, the company will lose crucial revenue for anti-poaching and community assistance undertakings.



Elephant Status

Each of the hunting areas boasts a healthy elephant population. Due to the inability to import elephant ivory into the United States, no elephant hunting safaris have been conducted since 2014. This has resulted in a large potential loss of income to the company that would be directed towards anti-poaching and community assistance. All the hunting areas provide year-round access to permanent water and a healthy food source of mango trees, marula trees, and others. Herds made up of cows, calf, and young bulls are frequently seen. Also, mature elephant solitary bulls and bachelor herds are present in all the areas. Since 2013, there have only been two poaching incidents regarding elephant. This is a direct result of the company's continuous anti-poaching activities.

Leopard Status

Leopard are abundant in all the company's hunting areas due to their strong prey base of impala, reedbuck, and bush pig. It is not uncommon during the day to see leopard sleeping and circling their territory in the hunting areas. The company maintains a low leopard off take of an average of three per year in each area. The professional hunters are selective in ensuring only mature male leopard are harvested. Game camera pictures are compiled for leopard as well. Lastly, the same agreements in place for any loss of livestock by lion apply to leopard. For all these reasons, the leopard populations in the areas are believed to be stable and increasing.

CONCLUSION

The sustainable hunting program and practices of Bushman Hunting Safaris Limited are enhancing the survival of the lion. The company's efforts address the greatest threats to lion in Tanzania: human-wildlife conflict, habitat encroachment, and prey base degradation.

The company's programs to curb and address human animal conflict have enhanced the survival of lion by increasing tolerance and appreciation by providing educational workshops in villages on the long-term benefits of wildlife conservation and hunting, that incentivize the protection of lion and other species instead of retaliation or poaching. The company policy of compensating cattle lost to lion is a strong deterrent to retaliatory killings. Lastly, the

company's training programs on a safe and effective approach to deal with crop raiding elephants and other species has been successful in stopping retaliatory killings and has improved the tolerance of local people to the area's increasing wildlife.

Further, by providing funds for community development and contributing 50% of game meat harvested, a strong relationship has been formed between the company and the neighboring villages. The company's multifaceted approaches to community contributions provide a strong financial incentive and knowledge of the long-term benefits of conservation and hunting to the communities.

The company's habitat protection program greatly reduced the encroachment of the cattle herders into the Maswa Game Reserve and neighboring Serengeti National Park. The program safeguards the healthy grass used by prey base animals and helps maintain a strong prey base population within the hunting areas.

In addition to the habitat protection program in place, the continuous monitoring of the hunting areas by the anti-poaching units prevents habitat and prey base losses. Illegal timber poaching and charcoal burning destroys hardwoods that take hundreds of years to grow. The company has arrested numerous timber and charcoal poachers and seized their saws and equipment. Combined, the strict habitat protection program and anti-poaching campaigns against timber and charcoal poachers serve to preserve the habitat for lion species.

Moreover, continuous and year-round anti-poaching patrols protect prey base species such as buffalo, wildebeest, and zebra. The anti-poaching patrols arrest poachers, remove snares, gather information from village informants, and maintain a constant presence in the hunting areas that deter incursion. The company's contribution of funds, equipment, and technology have allowed the anti-poaching units to more effectively curb poaching in the areas.

In sum, the combination of substantial community benefits and community education, habitat protection programs, a strong anti-poaching presence, and a sustainable, legal, and ethical approach to lion hunting reduces human lion conflict, and defends the prey base and habitat. Bushman Hunting Safaris area management provides and will continue to provide lion enhancement.

Name: Talal Abood

Signature:  _____

Position Held: Owner and Managing Director

Operator Name: Bushman Hunting Safaris Limited

APPENDIX

No.	Title	Remarks
1	Map of hunting areas	
2	Performance Evaluation Letter from Ministry of Natural Resources and Tourism	
3	Professional Hunters Contract	
4	Donations to Government Anti-Poaching	2015-2013 in Maswa Game Reserve, Rungwa Rungwa Game Reserve, and Selous Game Reserve
5	Anti-Poaching Fuel Expenses	2015
6	Anti-Poaching Fuel Expenses	2014
7	Anti-Poaching Fuel Expenses	2013
8	Anti-Poaching Reports	2015-2013
9	Habitat Protection Program Results and Letter from Ministry of Natural Resources and Tourism Commending the Company for Efforts Against Cattle Incursion	Impounded cattle and cattle herder fines 2013-2016 for Maswa Game Reserve North
10	Community Assistance Bank Transfers	2013-2015 for Maswa Game Reserve North, Rungwa Rungwa East, and Selous Game Reserve MHJ3
11	Letters of Acknowledgement and Agendas for Use of Funds	2013-2015 for Maswa Game Reserve North, Rungwa Rungwa North, and Selous Game Reserve MHJ3
12	Letter Regarding Conservation Education Program and Bank Transfer	
13	Community Development Pictures	
14	Habitat Protection Program Picture	Illegal timber poaching, illegal charcoal burning, and cattle impoundment
15	Anti-Poaching Pictures	
16	Prey Base Specie and Wildlife Pictures	All from company hunting areas
17	Lion Pictures	All from company hunting areas

(b) (6)

10 February 2017
Date

(b) (6)

Pay To The Order Of 057-005

\$ 100.00

One Hundred and 00/100

Dollars

Security Deposit on Demand



For AFRICA'S HONOR PERMIT

(b) (6)

[Handwritten Signature]

Nothing to be signed

MAR - 7 2017