RCVD JAN 30 2018

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

Federal Fish and Wildlife Permit Application Form

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

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
(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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ragazzine	Justin	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Youngstown	Ohio	(b) (6)		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 174510095C/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.

Justin Ragazzine — 01/08/2018

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

   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:

   b. Date wildlife is to be hunted:

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

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):
      Zimbabwae, Save Valley Conservancy, Chishakwe Hunting Concession

   b. Date wildlife was hunted:
      November 27 2017

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

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 Josiah Chinamano Road
Belmont, Bulawayo
Zimbabwe

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:	Cuan
Business Name:	Trophy Consultant International
Address:	4 Josiah Chinamano Road
Address:	
City:	Belmont
State/Province:	Bulawayo, Zimbabwe
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.

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: Custer Rozas Date: 1/8/18

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):

   Fauna & Flora Custom House Brokers
   15231 135TH Ave
   Jamacia, NY. 11434

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 Meehan
    (201) 370-2366 jjmeehan@faunaandflora.com

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.

RCVD JAN 30 2018

UNITED STATES POSTAL SERVICE

POSTAL MONEY ORDER

Serial Number
(b) (6)

Year, Month, Day
2018-01-09

(b) (6)

U.S. Dollars and Cents
$100.00

Amount
One Hundred Dollars and 00/100 **********

Pay to U.S. Fish + Wildlife Service

Clerk 05

Address 5725 Leesburg Pike
Falls Church, VA 22041

From Justin Ragazzine

Address (b) (6)

Youngstown Ohio (b) (6)

Memo

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SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 26 2018 LB

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Whitworth	Kenneth	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hardinsburg	KY	(b) (6)		U.S.A.

2.a. Mailing address (only if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
Hardinsburg	KY	(b) (6)		U.S.A.

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.

Kenneth (b) (6) Whitworth — 03/16/2018

Signature of applicant/Principal Officer 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: 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.

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

Kenneth (b) (6) Whitworth

(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.

4. 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

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:
South Africa
Associated Private Nature Reserves- Umbabat Private Nature Reserv
Hoedspruit

b. Date wildlife is to be hunted:
May 26th 2018 to June 24th 2018

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

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:

b. Date wildlife was hunted:

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

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]:

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). I have not hunted yet, and do not currently hold any such permits or licenses.
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:
Business Name: Life-Form Taxidermy
Address: No 7 Aluminum Road / PO Box 763
City: White River
State/Province: Mpumalanga
Country, Postal Code: South Africa 1240

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?

Please See the included document from Bomo Edith Edna Molewa, Minister of Environmental Affairs.

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?

Lion License Fee = $850. Lion Trophy Fee = $42,850. Please see the included document from Bomo Edith Edna Molewa, Minister of Environmental Affairs.

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

This is the first Lion to be hunted in the Umbabat which forms part of the APNR (Associated Private Nature Reserves)

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: [redacted] Date: 03/16/2018

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).

Government Gazette
Staatskoerant

REPUBLIC OF SOUTH AFRICA
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DEPARTMENT OF ENVIRONMENTAL AFFAIRS

NOTICE 19 OF 2018

NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT, 2004

(ACT NO. 10 OF 2004)

NON-DETRIMENT FINDINGS

I, Bomo Edith Edna Molewa, Minister of Environmental Affairs, hereby publish the non-detriment findings made by the Scientific Authority in terms of section 62 of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) for implementation and set out in the Schedule hereto.

BOMO EDITH EDNA MOLEWA
MINISTER OF ENVIRONMENTAL AFFAIRS

Non-detriment finding assessment for *Panthera leo* (African lion)
Reference Number: Pan_leo_Sep2017
Date: 25 September 2017
Issued by the Scientific Authority of South Africa

Summary of findings

The South African population of *Panthera leo* (African lion) is included in Appendix II to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). In terms of Article IV of the Convention, an export permit shall only be granted for an Appendix II species when a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species. This document details the undertaking of a non-detriment finding (NDF) assessment (Figure 1) for the African lion and is based on the best available information, current as of September 2017.

African lions are long-lived with both sexes living longer than 12 years. The species has a low reproductive rate with females replacing themselves only every second year. The African lion is a generalist species that can utilize a wide range of habitats and prey species. Due to biological, social and anthropogenic constraints, dispersal ability of both sexes is relatively poor, although some long distance dispersal of males does occur. The species is sensitive to human activity and is conservation dependent in South Africa, occurring solely in state-protected areas and on a limited number of privately owned game reserves, all of which are fenced.

The African lion is considered an uncommon species within South Africa, with a restricted and fragmented distribution. The total national wild population is estimated at approximately 2876 individuals in an estimated land area of 41 745 km². Eighty-three percent of the population is well protected, primarily within the Kruger National Park, the Kgalagadi Transfrontier Park and the Hluhluwe iMfolozi Park, where recent quantitative data suggest that lion populations are stable to increasing. The remainder of the national population (approximately 500 individuals in a combined area of ca. 8500 km²) occurs in 45 small reserves where lions have been re-introduced and are intensively managed. This healthy wild lion population persists alongside a large captive population of approximately 7 000 lions kept in around 260 breeding/captive facilities in South Africa.

At present there are no major threats to the wild and managed lion populations within South Africa, although the management of re-introduced wild lion needs some improvement. Minor threats include overutilization, disease, poaching and conflict with communities around protected areas. Although there are no specific figures on the illegal trade of lions in South Africa, provincial conservation authorities indicate that illegal utilization of wild lion is generally small to negligible. The trophy hunting of captive-bred lions poses no threat to the wild lion population within South Africa, and it is thought that captive lions may in fact serve as a buffer to potential threats to wild lions by being the primary source of hunting trophies and derived products (such as bone). Up until early 2016 when the USA stopped the import of lion trophies from South Africa due to the listing of *Panthera leo* as threatened on the

Endangered Species Act, the bone in trade was primarily a by-product derived from captive lion trophy hunts.

As part of a comprehensive management approach for lion, a Biodiversity Management Plan (BMP), which includes a meta-population management plan and several actions relating to the management of captive lions, was developed in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004. However, since the BMP was published for implementation only recently (in December 2015), its effectiveness cannot yet be assessed. Local level management plans are however effectively implemented.

Hunting of lion is not allowed in any of the national parks and only limited hunting is allowed in some provincial state reserves, effectively ensuring strict protection of the majority of the wild population (>80% of the total lion population). Harvest of wild lion in the South African context is primarily for the control of damage causing (stock-raiding) lions and population management. Off-takes of lion (translocation and culling) within South African National Parks are associated with ecological management interventions and guided by a robust scientific framework. All re-introduced wild populations are at times managed through culling and translocation to mimic the population dynamics processes that are absent in small populations. This ecological harvesting benefits the conservation of the species.

Consumptive use of lion for commercial purposes is mostly restricted to private game reserves. In South Africa very few wild lions are trophy hunted each year (typically less than ten lion involving less than 5% of lion hunts on private property), and hunting trophies are largely sourced from captive populations. Off-takes from wild lion populations are managed on a local scale with ecologically based local quotas. In some cases there are local, informal management plans and approved local management plans for specific reserves that govern the type of lion that may be hunted, typically male lions over six years of age. Guidelines for the trophy hunting of wild lions in South Africa have been developed and now form part of permit conditions within the provinces. In most provinces, off-takes are effectively monitored through the attendance of lion hunts by provincial conservation officers. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat.

In conclusion, the NDF assessment undertaken for the African lion (Figure 1) demonstrates that legal local and international trade poses a low to moderate, but non-detrimental risk to the species in South Africa (Figure 2). The species is well managed and the Scientific Authority does not have any current concerns relating to the export of wild lion in accordance with Article IV of CITES. It is recommended that hunting of lion from reserves smaller than 1000 km^2 be permitted only when in accordance with a meta-population management approach, and that guidelines be developed in this regard.

The Scientific Authority does not consider the export of captive-bred lion trophies or captive-bred live lion for zoological or breeding purposes to be detrimental to the wild lion population in South Africa. At present there is no evidence to suggest that the lion bone trade between South Africa and East-Southeast Asia is detrimental to South Africa's wild lion population. In accordance with the annotation to the Appendix II listing of the African lion that was adopted at the 17th Conference of the Parties to

CITES, a quota for the export of skeletons derived from captive breeding operations must be established and revised on an annual basis to ensure sustainability, and measures must be implemented to prevent any detrimental impact to wild lion populations.

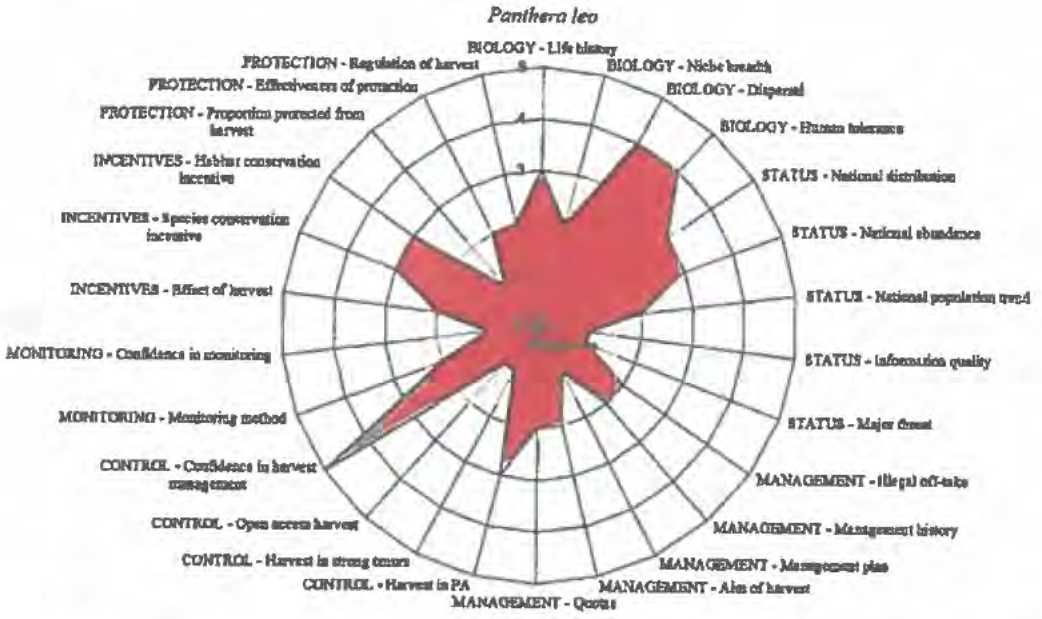

Figure 1: Radar chart summarizing the non-detriment finding assessment for *Panthera leo* (African lion) in accordance with the CITES NDF checklist. Explanations of scores given are detailed in Table 1. Higher scores are indicative of higher risks to the species. The limited area shaded in the radar chart demonstrates an overall low to moderate risk to the species.

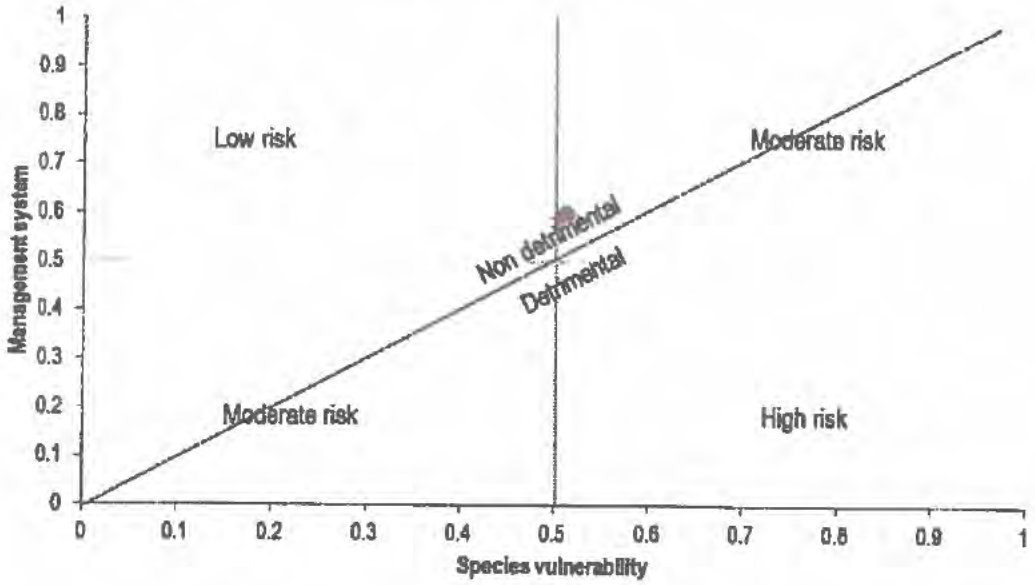

Figure 2: The level of risk of harvesting for *Panthera leo* (African lion) as represented by the relationship between species vulnerability (biology and status) (0 = low vulnerability; 1 = high vulnerability) and the management system to which the species is subjected (management, control, monitoring, incentives and protection) (0 = weak management system; 1 = strong management system). The figure shows that the species is at a low to moderate risk and trade is not detrimental.

Table 1: Detailed NDF assessment for *Panthera leo* (African lion) undertaken in accordance with the CITES NDF checklist. Scores assigned to each question are indicated (bold text and shaded blocks) along with detailed explanations/justifications where relevant. Higher scores are indicative of higher risks.

Biological characteristics		
1. Life history: What is the species' life history?	High reproductive rate, long-lived	1
	High reproductive rate, short-lived	2
	Low reproductive rate, long-lived	**3**
	Low reproductive rate, short-lived	4
	Uncertain	5
Lions are long-lived. Lionesses can live up to 14-16 years, while most males live up to 12-14 years in the wild (Packer et al. *1988). Litter size can range from one to six cubs, with 98% of litters containing 1-4 cubs (Packer & Pusey 1987). In general, there is high cub survival with >50% survival in the first year of life, which leads to longer birth intervals. At present the birth interval for Kruger National Park (KNP) is 2.3-2.4 years and ranges between 2.5-3.5 years within savannah woodland systems. If a female produces three cubs every 2.5-3 years, the net effect is approximately one cub per year. Fecundity is defined as the number of females that a female produces over her lifetime to replace her. Thus in the case of lions within South Africa, a female produces on average a female every second year if a 1:1 sex ratio is assumed, and lions therefore have a low reproductive rate.*		
2. Ecological adaptability: To what extent is the species adaptable (habitat, diet, environmental tolerance etc.)?	Extreme generalist	1
	Generalist	**2**
	Specialist	3
	Extreme specialist	4
	Uncertain	5
Within South Africa the majority of lions occur in savannah, but they have also been successfully reintroduced to the subtropical thicket biome of the Eastern Cape and the semi-arid Nama Karoo biome (Karoo National Park). Lions readily adapt to hunting in varied habitats, generally having greater success when hunting in areas with longer grass (Funston et al. *2001) or greater cover (Hopcroft* et al. *2005). Species at the top of the food chain, such as predators, are mostly considered specialists. However within the large carnivore guild, lions can be considered generalists when compared to other large mammals as they utilize a wider range of habitats and prey species.*		
3. Dispersal efficiency: How efficient is the species' dispersal mechanism at key life stages?	Very good	1
	Good	2
	Medium	3
	Poor	**4**
	Uncertain	5
There are biological, social and anthropogenic constraints to dispersal in lions, and based on these cumulatively, lions can be classified as poor dispersers, although some long distance dispersal of males does occur. Male cubs are excluded from their maternal pride when they reach maturity at approximately three to four years of age, most of which then form coalitions with other males (Pusey & Packer 1987; Packer & Pusey 1993). Dispersing males face several challenges, for example dispersing into a high risk environment within which they have to hunt for themselves, and often obtain injuries as a result. Most young lionesses attempt to remain in the pride into which they were born, and those that do not remain typically do not disperse far and attempt to establish a territory adjacent to their natal territory. Lions dispersing out of protected areas are invariably killed, contributing further		

to the poor dispersal ability of lions in the South African context.		
4. Interaction with humans: Is the species tolerant to human activity other than harvest?	No interaction	1
	Pest / Commensal	2
	Tolerant	3
	Sensitive	**4**
	Uncertain	5
In South Africa lions are conservation dependent, occurring solely in protected areas and on game farms, all of which are fenced. Across Africa, lion populations in fenced areas are significantly closer to their estimated carrying capacity than unfenced populations (Packer et al. *2013). Lions are sensitive to human modified landscapes.*		
National status		
5. National distribution: How is the species distributed nationally?	Widespread, contiguous in country	1
	Widespread, fragmented in country	2
	Restricted and fragmented	**3**
	Localized	4
	Uncertain	5
At present the lion distribution within South Africa is restricted and fragmented (Figure 3). Any change in the current distribution will be dependent on the establishment of new protected areas into which lions can be re-introduced. Lions originally roamed freely across most of South Africa but as a result of changes in land use (mostly for farming), free roaming lions were mostly extirpated from farmland and restricted to large national parks by the middle of the 20th century. The subsequent expansion of game reserves, especially since the early 1990s, has resulted in an increased range for lion and wild lions currently occur in isolated areas in all provinces of South Africa, except for the Free State. The estimated land area where lion occur is 41 745 km², with the largest proportion comprising a few large national or provincial protected areas (33 200 km², ca. 80%), and with the remainder made up of 45 small private or state reserves (Figure 3) with a combined area of ca. 8500 km² (Miller et al. *2016b).*		

Figure 3: The current distribution of lions in South Africa including both original and re-introduced populations.

6. National abundance: What is the abundance nationally?	Very abundant	1
	Common	2
	Uncommon	3
	Rare	4
	Uncertain	5

Wild and re-introduced lions in South Africa are estimated to total about 3490 individuals (Table 1), including those in transfrontier zones (Miller et al. *2016b). Altogether about 2376 lions (83% of the total South African population) are well protected within South Africa's national parks (Miller* et al. *2016b). The total formally protected mature population of lions (1286) in South Africa represent 3–6% of the global mature population of 23 000–39 000 lions (Bauer* et al. *2015; Riggio* et al. *2013). The largest areas in the country with lion are the Kruger National Park, which straddles the provinces of Limpopo and Mpumalanga (part of the Greater Limpopo Transfrontier Park), and the Kalahari Gemsbok National Park in the Northern Cape (part of Kgalagadi Transfrontier Park). The Greater Limpopo Transfrontier Park subpopulation is estimated at* c. *2000 individuals (South Africa only) if the private conservancies open to Kruger National Park on the western boundary are included (300 lions) and represents 70% of the wild lion population in South Africa.*

During 2010, 500 lion were estimated to occur in the Kgalagadi Transfrontier Park (Ferreira et al. *2013). Recent mark-recapture estimates for the South African side of Kgalagadi Transfrontier Park may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238-256), and the number of mature individuals (excluding cubs) is estimated to be 167 (95% confidence intervals 160-177) (Miller* et al. *2016b). Fourteen lion occur in the Greater Addo Elephant National Park (2011) (Eastern Cape), 8 in the Karoo National Park (2011) (Western Cape), 13 in the Marakele National Park (2011) (Limpopo) and 120 in Hluluwe-iMfolozi Park (KwaZulu-Natal).*

Reintroduction of lion into small reserves (including national parks, provincial protected areas, conservancies and private reserves of <1000 km² in area) started in the early 1990s and there are currently about 500 lions on 45 small reserves (Miller et al. 2013; Miller & Funston 2014). All small reserve subpopulations are ecologically functional as, for example, they are large enough for social dynamics to continue unhindered, although some reserves may import prey stocks (Power 2002, 2003; Hayward et al. *2007).*

Table 1: *Current numbers of wild lion in South Africa and surrounding transfrontier areas. All counts were made between 2008 and 2015 (Miller* et al. *2016b).*

Location (sub-location)	Total lions (SA only)	Number mature lions (SA only)
Greater Limpopo TP (Kruger NP)	*2000 (c. 1700)*	*1060 (c. 900)*
Associated Private Nature Reserves (Greater Kruger NP)	*300*	*160*
Kgalagadi TP	*520 (246)*	*255 (167)*
Greater Mapungubwe TFCA	*~50 (10)*	*25 (5)*
Hluhluwe-iMfolozi Park	*120*	*54*
Total excl. small reserves	***2990 (2376)***	***1554 (1286)***
Small reserves	*500*	*225*
Total incl. small reserves	***3490 (2876)***	***1779 (1511)***

According to a study initiated in 2008 by the Department of Environmental Affairs (DEA) and conducted by the University of Free State, an estimated 3596 lions were kept in 174 breeding facilities in South Africa during 2008 (Taljaard 2009). It is estimated that at present between 3600 and 6000

lions are kept in at least 174 breeding/captive facilities in South Africa (Williams et al. *2015). According to recent data (2017) provided by DEA, this number is likely to be closer to 7 000 individuals kept in approximately 260 facilities.*

7. National population trend: What is the recent national population trend?	Increasing	1
	Stable	2
	Reduced, but stable	3
	Reduced and still decreasing	4
	Uncertain	5

When considering only the wild and re-introduced subpopulations in recent decades, lion numbers have increased and have probably been stable for the last thirty years in the two large wild subpopulations (Miller et al. *2016b). Recent surveys using 240 call-up stations distributed randomly throughout the Kruger National Park indicated the subpopulation has increased over the period 2000-2015 from 1684 (95% confidence intervals 1617-1751) to 1763 (95% confidence intervals 1680-1846) individuals and for adult females specifically, from 415 (95% confidence intervals 380-450) to 589 (95% confidence intervals 560-618) (Miller et al. 2016b). The lion population in the Kgalagadi Transfrontier Park has been fairly stable since the first population estimate in 1976 of 140 lion (range 108-181). In 1996/7 the population was estimated at 131 (range 106 – 156), and between 1998 and 2001 at 120 individuals (range 113-131). In 2010, 500 lion were estimated to occur in the Kgalagadi Transfrontier Park (Ferreira* et al. *2013). Recent mark-recapture estimates for the South African side of Kgalagadi Transfrontier Park may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238-256), and the number of mature individuals (excluding cubs) is estimated to be 167 (95% confidence intervals 160-177) (S. Ferreira unpubl. data). Since 2004 the number of lion on state-owned protected areas in KwaZulu-Natal has increased from 82 to 234, while the number of lion on private and communal land has increased from 33 to 82 during this same time period. Overall this represents an almost three-fold increase in the size of the lion population in the province, from 115 to 316, over a 7 year period (2004-2010). The remaining national parks have small numbers of lion that are intensively managed to maintain a single pride with 2-6 adult females. Lions also re-colonized the Mapungubwe National Park in about 2000, but fewer than 10 lions occur there.*

8. Quality of information: What type of information is available to describe abundance and trend in the national population?	**Quantitative data, recent**	1
	Good local knowledge	2
	Quantitative data, outdated	3
	Anecdotal information	4
	None	5

Surveys in the Kruger National Park, and the Kgalagadi National Park are conducted regularly, which represent 68% of the total wild and managed population in South Africa. In the Kruger National Park, three park-wide surveys have been undertaken to date. In addition a 7-year study on the lions in Kruger National Park was recently completed. The lions within Hluhluwe iMfolozi Park are also monitored on a regular basis.

9. Major threats: What major threat is the species facing (underline following: overuse/ habitat loss and alteration/ invasive species/ other: disease; human wildlife conflict) and how severe is it?	**None**	1
	Limited/Reversible	2
	Substantial	3
	Severe/Irreversible	4
	Uncertain	5

At present there are no major threats to the wild and managed lion populations within South Africa. Minor threats include overutilization, disease, poaching and conflict with communities around protected areas. Most lions currently in captivity originate from captive-bred stock and are utilised by the trophy hunting industry and, since 2008, the lion bone trade as well. In terms of the Threatened or Protected Species (TOPS) Regulations (2007), wild lions may not be introduced into captivity. This also does not seem necessary as lions breed well in captivity. Although captive lions are not considered to be of any conservation value to the wild lion population (Hunter et al. *2013), it is thought that they may serve as a buffer to potential threats to the wild population by being the primary source of hunting trophies and derived products (Lindsey* et al. *2012a) (e.g. bones). A study conducted by TRAFFIC in 2013-2014 showed that the lion bone trade between South Africa and East-Southeast Asia is not detrimental to the wild lion population, and the bone in trade is primarily a by-product derived from captive lion trophy hunts (Williams* et al. *2015), at least up until early 2016 when the USA stopped the import of lion trophies from South Africa due to the listing of* Panthera leo *as threatened on the Endangered Species Act. The male lions are sold to trophy hunters, and the skeletons to East-Southeast Asia. The females are used for breeding stock and are eventually sold into the bone trade once they have ceased to breed (Williams* et al. *2015). Hunting of captive-bred lion differs from wild lion hunting in that lions are hunted in smaller areas (49.9 ± 8.4 km² compared to 843-5933 km² depending on the country), hunts are cheaper (US$20 000-40 000 compared to US$37 000-76 000), shorter (3.3 compared to 14-21 days), success rates are higher (99% compared to 51-96%), and trophy quality is higher (skull length + breath = 639 cm compared to 614-638 cm) (Lindsey* et al. *2012a).*

Harvest management

10. Illegal off-take or trade: How significant is the national problem of illegal or unmanaged off-take or trade?	None	1
	Small	**2**
	Medium	3
	Large	4
	Uncertain	5

Although there are no specific figures on the illegal trade of lions in South Africa, provincial conservation authorities indicated that illegal use or trade of wild lion is generally small to negligible. There is no recorded/known illegal trade in wild lion in Gauteng, KwaZulu-Natal or the Eastern Cape and illegal utilization of lion within South Africa's national parks is negligible. There are currently no statistics relating to cases involving lion in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. Illegal trade in captive-bred lions within North West Province is suspected to take place, as this industry is large and a challenge to regulate. Lions along the Kgalagadi Tranfrontier Park boundaries have been persecuted for decades (Mills et al. *1978; Van Vuuren, Herrmann & Funston 2005; Funston 2011).*

11. Management history: What is the history of harvest?	Managed harvest: on-going with adaptive framework	1
	Managed harvest: on-going but informal	**2**
	Managed harvest: new	3
	Unmanaged harvest: on-going or new	4
	Uncertain	5

Lions are actively managed in most areas within South Africa. As part of a comprehensive management approach for lion, the Department of Environmental Affairs has developed a Biodiversity Management Plan (BMP) for lion in terms of the National Environmental Management: Biodiversity Act, 2004 (NEMBA 2004), which was published for implementation in December 2015.

Apart from the management of damage causing animals, the lion population within the Kgalagadi Transfrontier Park has never been managed (Mills et al. *1978; Van Vuuren, Herrmann & Funston 2005; Funston 2011). The lions that were established in the Hluhluwe-iMfolozi Park have been managed quite intensively, mainly to minimize conflict along the park boundary (Anderson 1980) and more recently to improve their genetic diversity and thereby reproductive potential (Trinkel 2008). Additional key management actions in KwaZulu-Natal for 2011 and 2012 included the determination of a provincial conservation target for lion, and the continuation with surveillance and monitoring of the provincial lion population and illegal hunting incidents. Utilisation and keeping of lion in the wild is closely managed in the province of Gauteng due to the dense human population in the province. Off-takes of lion (translocation and culling) within South African National Parks are associated with ecological management interventions and guided by a robust science framework.*

In all the larger parks in South Africa, lions occasionally venture out of the park and kill livestock. In the Kruger National Park and Hluhluwe-iMfolozi (Anderson 1980) these lions are generally shot by rangers, whereas in the Kgalagadi rangers try and translocate them back into the park (Mills et al. *1978; Funston 2002). The reintroduction of lions into some 45 smaller fenced game reserves in South Africa has largely been for eco-tourism purposes rather than ecological reasons (Slotow & Hunter 2009). Reintroduced lions are currently micromanaged (Hayward* et al. *2007a,b,c; Hunter et al. 2007; Kettles & Slotow 2009) primarily in isolation from each other, the net effect of which reduces their conservation value on a regional scale (Slotow & Hunter 2009). Ferreira & Hofmeyr (2014) advocate an approach where managers of small areas mimic natural social dynamics such as coalition tenure, density dependent changes in litter size, age at first birth and birth intervals, as well as sub-adult dispersal. This assists with achievement of population and evolutionary targets through a process-based approach mimicking drivers of variance in social groups. It is further suggested that these small populations be managed on a regional level as a single population with social groups spatially isolated over the region (Ferreira & Hofmyer 2014).*

12. Management plan or equivalent: Is there a management plan related to the harvest of the species?	**Approved and co-ordinated local and national management plans**	1
	Approved national/state/provincial management plan(s)	2
	Approved local management plan	3
	No approved plan: informal unplanned management	4
	Uncertain	5

*A Biodiversity Management Plan for the African Lion (*Panthera leo*), which includes a meta-population management plan and several actions to assess and improve the management of captive lions (such as the development of national standards for the keeping and captive breeding of lions and an audit of all lion keeping facilities), was published for implementation in December 2015 (Government Gazette vol. 606 no. 39468). Lions are protected under various provincial Ordinances / Acts, and provincial conservation authorities often require ecological management plans when lion is re-introduced to a property. There are also local, informal management plans and approved local management plans for specific reserves that specify the type of lion that may be hunted, typically male lions above six years of age (Miller* et al. *2016a).*

13. Aim of harvest regime in management planning: What is harvest aiming to achieve?	Generate conservation benefit	1
	Population management/control	2
	Maximize economic yield	3
	Opportunistic, unselective harvest, or none	4
	Uncertain	5
Only wild and managed populations were considered in the scoring of this question since trophy lions are predominantly sourced from captive-bred populations (Sinovas et al. *2016) with less than 5% of lion hunts conducted on private property between 2008 and 2010 having targeted wild lions. Consumptive use of lion for commercial purposes is mostly restricted to private game reserves. Private landowners that conduct legal hunts of wild lions have an interest in ensuring the stability of their lion populations. In addition to the limited trophy hunting of wild lion, other kinds of harvesting are undertaken as a management tool to regulate populations, such as culling and live removals. These harvests aim to mimic population dynamics that are absent in managed prides (Ferreira & Hofmeyr 2014; Miller* et al. *2015).*		
14. Quotas: Is the harvest based on a system of quotas?	On-going national quota: based on biologically derived local quotas	1
	On-going quotas: "cautious" national or local	2
	Untried quota: recent and based on biologically derived local quotas	3
	Market-driven quota(s), arbitrary quota(s), or no quotas	4
	Uncertain	5
Current harvest is not based on a national quota system. Harvest is however managed on a local scale with ecologically based local quotas. Permits for wild lion hunts in South Africa are issued by the relevant provincial conservation authority, as are permits for hunting captive-bred lions. Off-takes of lion within South African National Parks are guided by a strict utilization strategy.		
Control of harvest		
15. Harvesting in Protected Areas: What percentage of the legal national harvest occurs in State-controlled Protected Areas?	High	1
	Medium	2
	Low	3
	None	4
	Uncertain	5
Hunting of lion is not allowed in national parks, which collectively represents the majority of the wild population (>80% of the total lion population), but there is limited legal hunting in some provincial state protected areas. In KwaZulu-Natal damage-causing animals can be hunted by local hunters on the borders of protected areas. The number of damage causing lions removed annually in the Kruger National Park is relatively low (<1% of the population). In smaller reserves this off-take is slightly higher at 10-20%. Removals of lion from the Kgalagadi Transfrontier Park are much higher.		
16. Harvesting in areas with strong resource tenure or ownership: What percentage of the legal national harvest occurs outside Protected Areas, in areas with strong local control over resource use?	**High**	1
	Medium	2
	Low	3
	None	4
	Uncertain	5
Utilization of lion for commercial purposes is mostly restricted to private game reserves. Trophy hunting of lions is popular in South Africa, although trophies are predominantly sourced from captive-		

bred populations (Sinovas et al. 2016). Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008 to 2010 reporting period having targeted wild lions. Wild lions are hunted in the Associated Private Nature Reserves (APNR) bordering the Kruger National Park and open to the park. The APNR has a very strict hunting protocol that is strictly enforced. There is also a general memorandum of understanding between the Kruger National Park and the APNR. Aspects with regards to trophy hunts are handled on a case by case basis.

17. Harvesting in areas with open access: What percentage of the legal national harvest occurs in areas where there is no strong local control, giving *de facto* or actual open access?	**None**	**1**
	Low	2
	Medium	3
	High	4
	Uncertain	5

No lions occur within open access areas. Damage causing animals within these areas originate from protected areas and the number of animals removed on average is low.

18. Confidence in harvest management: Do budgetary and other factors allow effective implementation of management plan(s) and harvest controls?	High confidence	1
	Medium confidence	2
	Low confidence	3
	No confidence	4
	Uncertain	**5**

Local level management plans and harvest controls are effectively implemented. On a national scale however there is no budget or capacity to fund a national coordinated system that can be implemented for all re-introduced lion populations. Thus budget and legal restrictions are hampering the scaling up of local management to enhance a larger management framework for lion conservation. The biodiversity management plan for lion, that includes a meta-population management plan, has only recently (December 2015) been published for implementation. Confidence in the effective implementation of this management plan is thus still uncertain.

Monitoring of harvest

19. Methods used to monitor the harvest: What is the principal method used to monitor the effects of the harvest?	Direct population estimates	1
	Quantitative indices	**2**
	Qualitative indices	3
	National monitoring of exports	4
	No monitoring or uncertain	5

Lion is currently listed as vulnerable in terms of the National Environmental Management: Biodiversity Act (Act No. 10 of 2004) (NEMBA), meaning that a permit is required if a person intends to carry out any restricted activity involving lion such as keeping, hunting, catching, breeding, selling, conveying or exporting from the country. The permit system is regulated through the Threatened or Protected Species (TOPS) Regulations (2007), which have been promulgated in terms of NEMBA. Lion is also protected under various provincial Ordinances / Acts. Within the Free State, Limpopo and Northern Cape, all lion hunts are attended by a provincial officer, while Mpumalanga's legislation does not require a conservation official to be present at lion hunts. Due to capacity constraints within KwaZulu-Natal, North West and the Eastern Cape, only some of the lion hunts are attended by a conservation officer. Lion hunts are not offered in Gauteng and the Western Cape. Data obtained from the provinces are used to calculate statistics on the trends in lion populations within the provinces and nationally. Any negative consequences of the harvest of lion will thus be detectable through the current permit monitoring system.

According to the CITES trade database that is administered by UNEP-WCMC, just over half (53%) of the lion (3508) exported from South Africa between 2000 and 2009 are wild sourced, but this is due to a reporting error. Lions bred in captivity, then released in extensive systems for a period of time before being hunted have in the past been incorrectly reported as source code "W" (i.e. wild). Delegated provincial management authorities have subsequently been requested to ensure the correct use of source codes so that the CITES trade records correctly reflect the trade in wild specimens. There is also a major discrepancy between reported exports and reported imports, with reported exports of captive sourced specimens greater than reported imports and conversely the reported exports of wild sourced specimens less than the reported imports. This would have contributed to inflated export figures overall and of wild sourced specimens in particular.

20. Confidence in harvest monitoring: Do budgetary and other factors allow effective harvest monitoring?	**High confidence**	**1**
	Medium confidence	2
	Low confidence	3
	No confidence	4
	Uncertain	5

There is a high confidence in the quantitative indices used to monitor the harvest of wild lions. Most reserves monitor their lion populations well and are well-resourced on a local level.

Incentives and benefits from harvesting

21. Utilization compared to other threats: What is the effect of the harvest when taken together with the major threat that has been identified for this species?	Beneficial	1
	Neutral	**2**
	Harmful	3
	Highly negative	4
	Uncertain	5

There is currently no major threat facing wild lions within South Africa. Trophy hunting of wild lions is limited, with the number of wild lion hunted over the period 1999-2008 never exceeding 10 lion per annum. Trophy lions are predominantly sourced from captive-bred populations. Harvesting as a tool for science-based population management of fragmented populations is beneficial to the population.

22. Incentives for species conservation: At the national level, how much conservation benefit to this species accrues from harvesting?	High	1
	Medium	2
	Low	**3**
	None	4
	Uncertain	5

Currently wild lion hunts are less than 10 per year and the majority of income originates from non-consumptive tourism. However, where lion trophy hunting occurs (e.g. APNR) it contributes directly to the conservation of the species. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat. However, in some cases benefits do not filter down to directly affected stakeholders and thereby affect conservation outcomes. Ecological harvesting of lions is practiced in some managed populations in order to mimic population dynamics that are absent (Ferreira & Hofmeyr 2014). These removals benefit the conservation of the species.

23. Incentives for habitat conservation: At the national level, how much habitat conservation benefit is derived from harvesting?	High	1
	Medium	2
	Low	**3**
	None	4
	Uncertain	5
Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008 to 2010 reporting period having targeted wild lions. The revenue generated through hunting contributes to the maintenance of areas where these lion populations can continue to exist. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat.		
Protection from harvest		
24. Proportion strictly protected: What percentage of the species' natural range or population is legally excluded from harvest?	**>15%**	**1**
	5-15%	2
	<5%	3
	None	4
	Uncertain	5
Hunting of lion is not allowed in any of the national parks and only limited trophy hunting is allowed on some provincial state reserves, this collectively representing the majority of the wild population (>80% of the total lion population). The scoring is based on the population size and not on the range of the species.		
25. Effectiveness of strict protection measures: Do budgetary and other factors give confidence in the effectiveness of measures taken to afford strict protection?	High confidence	1
	Medium confidence	**2**
	Low confidence	3
	No confidence	4
	Uncertain	5
The national and provincial permitting systems are effective.		
26. Regulation of harvest effort: How effective are any restrictions on harvesting (such as age or size, season or equipment) for preventing overuse?	Very effective	1
	Effective	**2**
	Ineffective	3
	None	4
	Uncertain	5
Regulation of harvest effort is effective. On a local scale specific individuals are selected for ecological harvesting, trophy hunting or removal of damage causing animals. Guidelines for the trophy hunting of wild lions in South Africa have been developed and form part of permit conditions within the provinces (Miller et al. *2016a).*		

List of participants:

1. Dr Sam Ferreira (SANParks)
2. Dr Paul Funston (Panthera)
3. Michele Pfab (SANBI)
4. Thea Carroll (DEA)
5. Dr Jeanetta Selier (SANBI)

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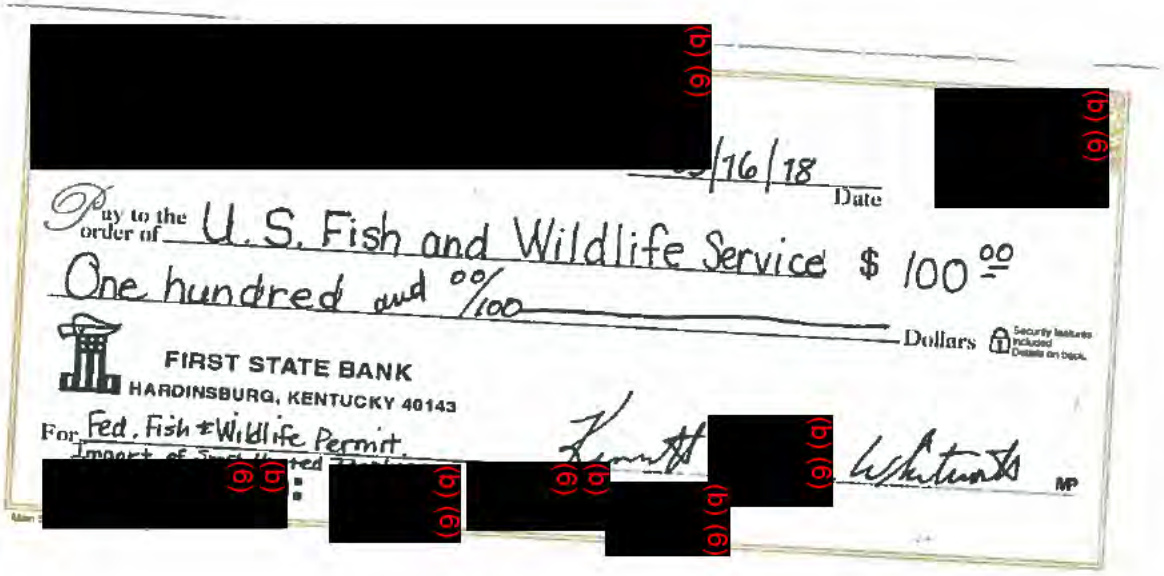
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Enhancement Finding
Applicant: Kenneth (b) (6) Whitworth (PRT-83426C)

Kenneth (b) (6) Whitworth submitted an application on March 26, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Umbabat Private Nature Reserves, Associated Private Nature Reserves (APNR), Hoedspruit, South Africa for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of South Africa, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy to be taken between May 26, 2018, and June 24, 2018, from this wild-managed lion (*P. l. melanochaita*) population within South Africa **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes South Africa, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from South Africa, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in South Africa.

In evaluating the available data on lion hunting in South Africa, the Service understands that South Africa has three classifications for lions: wild, wild-managed, and captive-bred and classifies wild and wild-managed lions separately from captive-bred lions raised for hunting purposes since the management and oversight of these specimens is different within South Africa. Therefore, information relevant to the Service's consideration on whether to permit the import of a sport-hunted trophy from Umbabat Private Nature Reserves, a reserve which maintains a population of wild-managed lions, must be evaluated based on information pertaining to the management of wild and wild-managed lions in South Africa.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in South Africa contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Whitworth's application involving a *P. l. melanochaita* sport-hunted trophy taken in Umbabat Private Nature Reserves, APNR, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita*

from Umbabt Private Nature Reserves. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All

necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Whitworth's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how South Africa's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also consider how a U.S. hunter's, in this case, Mr. Whitworth's, participation in the hunting program contributes to the overall management of lions within a country.

The management program in South Africa for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas;

management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On January 12, 2016, the Service sent a letter to South Africa's Department of Environmental Affairs (DEA) with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in South Africa, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our January 12, 2016, letter, the DEA provided four documents. In addition, the Service met with representatives of DEA during the 17th Meeting of the Parties to the Convention in Johannesburg in late September 2016. Further, since those meetings, there have been several written exchanges with DEA discussing the DEA's evaluation of reserves with lions and how these animals conform to DEA's lion management plan. The four document provided to the Service in January 2016, along with the Service's own final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DEA, comments received from interested parties, and Mr. Whitworth's application were the basis of this finding.

South Africa has defined three populations of lions that exist within the country through their Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP; December 2015): *Wild lions,* who completely fulfill their role in biodiversity processes and are largely unmanaged, and exist only in formally proclaimed national parks and game reserves. This population's vital rates and demographics are not actively manipulated; *Wild-managed lions,* which include all lions that have been re-introduced into smaller fenced reserves (<1000km^2), and are managed to limit population growth and maintain genetic diversity. Some of the vital rates and demographics of these lions are actively manipulated; and *Captive lions*, bred for financial gain, where all vital rates and demographics of these populations are actively manipulated.

Governance of Lions in South Africa: The lion is listed as vulnerable in the South African list of Threatened and Protected Species (ToPS) under Section 56(1) of the National Environmental

Management Biodiversity Act, 2004 (Act no 10 of 2004; NEMBA; BMP pg. 1). NEMBA further regulates a permit system regarding restricted activities involving specimens of listed threatened or protected species (Act no 10 of 2004; Chapter 7). Regulated activities in need of registration include, among others, captive breeding facilities, sanctuaries, scientific institutions, game farms, wildlife traders, wildlife product traders, taxidermists, wildlife translocators, and freight agents (NEMBA pg. 25).

NEMBA gives effect to the Convention on Biological Diversity (CBD) [South Africa is a party to CBD] and Section 24 in the Bill of Rights of the Constitution of the Republic of South Africa (1996). Under Section 24(b): "everyone has the right to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: (i) prevent pollution and ecological degradation; (ii) promote conservation; and (iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development" (BMP pg. 15).

In addition to South Africa's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, South Africa provided a copy of their CITES non-detriment finding (NDF) for lions. Their finding, while focusing only on wild and wild-managed lions, applies to all lion exports from South Africa, including the captive lion population. This was clarified through personal communication with the South African Management Authority, where the Service was informed that the finding may be amended to better clarify that the finding applies to all lions within South Africa. Included in Mr. Whitworth's application is a copy of the DEA's most recent lion NDF, dated January 23, 2018, which includes information on wild, wild-managed, and captive-bred lions and continues to find that the export of the species will not be detrimental to the survival of the species in the wild.

South Africa is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife.

In 1991, South Africa legalized private ownership of wildlife, leading to a significant rise in game ranches and farms. In 2010, private lands with wildlife covered approximately 16.8% of South Africa, compared to national and provincial protected areas accounting for only 6% (Cousins *et al.* 2010). It has been stated that this expansion of private lands and the wildlife industry resulting from the private ownership of wildlife is responsible for significantly increasing South Africa's large mammal populations (Crowley and Mokhema 2014). According to Crowley and Mokhema (2014), South Africa's game ranching industry is worth $1.1 billion a year and is growing at 10 percent annually. Under the ToPS regulations, permits can be obtained to carry out activities that

may negatively impact the survival of a listed species, such as possession or hunting, provided the applicant meets specific criteria, such as having a biodiversity management plan for the species protected by ToPS. This permitting regime generates funds for national conservation efforts, while allowing landowners to profit from maintaining wildlife on their property. The landowners can then reinvest in the property by funding conservation efforts, managing wildlife, and carrying out anti-poaching efforts (Cousins *et al.* 2010).

Current Lion Status in South Africa: The lion was almost extirpated in South Africa by the early 1900s, remaining only in small numbers in what is now Kruger National Park (NP) and the Kgalagadi Transfrontier Park (TP). With the formation of Kruger NP in the 1920s, wild lion numbers slowly recovered, growing to the current population of approximately 1,700 lions (BMP, pg. 40). Kgalagadi TP has a stable, albeit smaller, population of approximately 400 lions, but is considered a lion stronghold in southern Africa. Lions recolonized Hluhluwe-iMfolozi Park (HiP) in the 1950/1960s and that population is currently stable at approximately 120 lions. Along with small groups of lions in Addo Elephant National Park, Karoo National Park, Marakele National Park, there are approximately 2,200 wild lions in South Africa. In addition, there are approximately 800 wild-managed lions separated among 45 fenced reserves of less than 1,000 square kilometers each (BMP pg. 40). It should be noted, however, that DEA is evaluating each of these fenced reserves to confirm that the lions maintained on the reserve can be classified as wild-managed. As such, the Service evaluated this application, in part, based on DEA's evaluation of the reserve where the lion was taken.

When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. These three threats led to the shrinking of lion populations and their range from pre-Colonial South Africa, to the current situation of lions being found predominantly on a limited number of national parks and fenced reserves. However, given the current focus of wildlife management practices in South Africa on fencing protected areas, additional habitat loss has been minimized. Further, due to more intensive management of the fenced reserves to maintain biodiversity, more stable prey bases and limited human-lion conflict are being observed.

According to South Africa's Scientific Authority's NDF published in January 2018, there are no specific official figures on the illegal trade in lions and lion products in South Africa, which is consistent with their 2015 NDF. There are currently no statistics relating to cases involving lions in the National Environmental Compliance and Enforcement Report, although there are cases currently under investigation. No recorded or known illegal trade in wild lion has occurred in Gauteng, KwaZulu-Natal or the Eastern Cape, and the illegal utilization of lions within South Africa's national parks is negligible. However, according to the NDF, lions along the Kgalagadi Transfrontier Park boundaries have been persecuted for decades. Illegal trade in captive-bred lions within the North West Province is suspected to take place, as this industry is large and a challenge to regulate. The 2017 NDF does not discuss in further detail the reports referenced in the 2015 finding, regarding the illegal translocations of animals or trade in lions and their body parts for which offenders were not in possession of a permit to breed, keep, hunt, catch, sell, convey or export live animals or parts thereof. According to the 2015 and 2017 NDF, and supported by information in the Service's final listing rule, the illegal local and international trade in lions poses a

moderate, but non-detrimental risk to the species in South Africa (BMP pg. 14; USFWS 2015, 80 Fed Reg. 79999).

To manage any population to maintain an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number of lions estimated to constitute a viable population is 500 individuals. Kruger National Park, with approximately 1,200 lions, has a stable population of wild lion and is considered a stronghold for lions in South Africa. Kgalagadi Transfrontier Park, with a stable population of approximately 400 lions, is considered a potential stronghold and conserves the genetic diversity within the Kalahari ecosystem (Bauer et al. 2008, in Riggio et al. 2013 (pg. 32); Bjorkland 2003 (pg. 515, 518). Wild lions in HiP, Addo Elephant National Park, Karoo National Park, and Marakele National Park, albeit smaller in size, appear to be stable, but would need to grow to be considered potential strongholds for maintaining genetic diversity. All of these populations receive very little direct management and hunting is not allowed within the National Parks (BMP).

Lion Management in South Africa: In 2015, in response to the requirements under NEMBA and the SADC Treaty, and after stakeholder workshops in 2013 and 2014, South Africa published the Biodiversity Management Plan for the Lion (*Panthera leo*) in South Africa for 2015 to 2019 (BMP) and stated that the "BMP for African lion will be regarded as the national strategy for African lions in South Africa" (pg. 2). The BMP was created in response to the Regional Strategy for Lions in East and Southern Africa in 2005 (IUCN SSC Cat Specialist Group 2006), which encouraged the development of national strategies aligned with national strategies of neighboring countries. The BMP was developed jointly by South Africa's Department of Environmental Affairs, Council for Scientific and Industrial Research (CSIR), and Dr. Paul Funston (Panthera). The current BMP is the first in a series of five-year iterations, as required under NEMBA, where the success of the preceding five years will be measured, and adaptations made to ensure that the plan for the following five–year period is appropriate for the circumstances at the time.

The BMP has identified the vision that "...lions will provide key opportunities for biodiversity conservation, economic development, social benefits, and improved management capacity." The BMP lays out five specific objectives for the conservation of wild and wild-managed lions within South Africa:

- Improve the conservation status of lions within the broader conservation context.
- Develop and implement effective communication tools that are informed by scientific research (communication, education, and public awareness).
- Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws.
- Establish a lion forum or working group.
- Collaborate the alignment of this BMP with lion conservation plans in neighboring countries and link with international working groups.

All five of these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the party responsible for implementation. The BMP will be re-evaluated in 2019 to assess the success of the plan and to modify the BMP for 2020 to 2025 accordingly.

While these five objectives appear to serve a valuable role in lion management in South Africa, two are most relevant in determining if the implementation of the BMP enhances the propagation or survival of the species, as required by the Act for the issuance of this import permit. The first objective, "Improve the conservation status of lions", has been broken down into three sub-objectives for wild and wild-managed lions: maintain current protection status of lions; reassess the conservation status of lions; and enhance the conservation status of wild lions. The intended 5-year outcomes of these sub-objectives are to have stable wild lion populations in all protected areas with no illegal trade in wild lions, have more than 80% of all reserves with wild-managed lions integrated into a managed meta-population approach for genetic management, publish norms and standards for the management of wild-managed lions, and a stronger understanding of wild-managed lion population size and trends. To achieve these sub-objectives, South Africa has already conducted population surveys of wild lions in 2015 and will census every 3 years. They have also started implementing the managed meta-population plan with the goal of over 80% of reserves included by 2019. The norms and standards for the management of wild-managed lions was to be completed by the end of 2016 and the first audits to obtain a stronger understanding of wild-managed lion population trends was completed in 2015 and is suppose to continue annually thereafter. One of the first outcomes of these evaluations has been the apparent tightening of how DEA assesses whether a reserve holds "wild-managed" lions or if the lions on a reserve are considered "captive-bred". As such, the Service consulted with the DEA on whether the reserve identified in this application where the trophy animal will be taken maintains wild-managed lions.

The second objective, "Ensure that existing legal instruments are compatible and complementary at national and provincial levels, and improve the capacity to implement these laws", identifies two actions: ensure alignment on permitting decisions between national and provincial legislation; and address and implement training needs for all aspects of legislation regarding lions. The intended 5-year outcome of these two actions is to have well-trained managers that make better management decisions, and effective legislation to support lion conservation and sustainable utilization of lions.

The BMP has two additional objectives focusing specifically on wild-managed lions. As with the objectives discussed above, these objectives are stepped down to specific action items with intended 5-year outcomes, indicators on how the action plan is succeeding, and the parties responsible for implementation. The first is to maintain the wild-managed lions as a key population that contributes to socio-economic-ecological opportunities through mimicking "natural" ecological functions (e.g., wild lion survival rates, fecundity, litter sizes, and mortality rates). This objective is broken down to a number of action items ranging from mimicking survival changes through lethal and non-lethal removals, mimicking required immigration/emigration into an area, and measuring demographic responses by determining age- and sex-structure through ranger observations, and informing stakeholders on progress of management efforts. These action items predominately have target dates that are on-going, annual, or bi-annual, with outcomes that can be used in adaptive management efforts.

The second wild-managed lion objective is "To maintain lion genetic integrity by inducing social limitations through management-assisted dispersal and changes in dominance hierarchies", which focuses primarily on ensuring that lions within smaller fenced areas (<1,000 sq. km.) mimic natural biological processes such as natural dominance hierarchies and female dispersal to ensure genetic diversity. The action items for this objective include modeling genetic diversity within reserves, mimicking male dispersal from and into a social unit through removal (e.g., culling/hunting or translocation) and introduction (translocation) of males at appropriate ages, and mimicking occasional female dispersal into social units through removal and introduction.

The BMP has information on the lion's biology, habitat requirements, threats, and relevant legislation, as well as an extensive chapter on wild-managed lions. This chapter explores the history of wild-managed lions, particularly how lions had been managed in the past and what actions are needed to move forward in establishing a meta-population through connecting the reserves and allowing for genetically viable populations that can contribute to the overall wild lion population. According to the BMP, the wild lion populations are complemented by a fragmented population of wild-managed lions in South Africa found on fenced areas or reserves typically less than 1,000 square kilometers in size. This largely results from private property as well as wildlife ownership rights enforced by fencing as required by South African law. According to the BMP, even though opinions vary on the pros (Packer et al. 2013) and cons (Creel et al. 2013) of fencing as an essential component of range-wide lion conservation in the future, the use of fences is likely to increase as human land use continues to expand into lion ranges. The expanded use of fencing, particularly in areas where fencing is currently not widely utilized, could lead to continued fragmentation of lion habitats (Riggio et al. 2012, Dolrenry et al. 2014). Therefore, wild-managed lions in South Africa provides a key example on how to achieve integrated lion conservation goals in a changing African context that would enhance the survival of the species.

In the 1990s, the number of public and private game reserves started to increase in South Africa and many of them reintroduced lions, mostly as a tourist draw. Lions from these populations were then used for yet more reintroductions leading to a current number of about 800 lions on over 45 fenced reserves (Miller et al 2013). Many of these reserves have only one or two prides of lions, with the largest (Pilanesberg National Park and Madikwe Game Reserve) having four or five prides. Historically, most managers of these reserves had the tendency to manage their lion populations in isolation, although there was some movement of 'excess' lions.

Because of fragmented, isolated management of these populations, the conservation value of these lions has been questioned in the past (Hunter et al 2007, Slotow & Hunter 2009). Because of this, the BMP sets out management criteria within the reserves that maintains ecological processes and creates a meta-population (BMP pg. 41 and 42). Researchers noted indicators of inbreeding in two reserves (Trinkel et al. 2008, 2010), while several reserves experienced increased lion population growth rates with subsequent high lion densities (Miller & Funston 2014). The combination of high lion densities and restricted size of the reserves disrupts predator-prey relationships – often with prey dramatically declining (Tambling & du Toit 2005, Slotow & Hunter 2009). In addition, managers increasingly find it hard to locate new areas for 'excess' lions (Kettles & Slotow 2009). The Lion Management Forum (LiMF), founded in 2010, provides a platform for concerned

managers to discuss the unique issues surrounding small, fenced lion populations. LiMF members recognize that many of the natural processes characteristic of large naturally functioning lion populations have been disrupted on these small reserves. Given the small sizes of these reserves, limited opportunities exist for restoration of these natural processes Therefore, LiMF, and the BMP, have put forward management interventions that would mimic the outcomes of natural processes that are showing great success (Miller et al. 2013; Ferreira & Hofmeyr 2014).

The BMP recognizes that the managed lion meta-population is slightly contradictory to the theory of meta-population dynamics, as meta-populations are those with spatio-temporally variable subpopulation dynamics, variable dispersal, and availability of empty habitats that are largely connected (Oliveier et al. 2009). That is not the case with most wild-managed lion populations on small reserves in South Africa. Thus, in essence, the managed meta-population is a unique product of the South African response to managing and conserving large carnivores on isolated small reserves. The approach essentially recognizes a single population with social groups spatially isolated over vast areas. Some of these challenges can be reconciled through identifying regional nodes.

The lions for reintroductions into South Africa's small reserves were initially sourced from Etosha National Park, as well as Sabi Sand Game Reserve, adjacent to the Kruger National Park. Recently, SANParks relocated some animals from the South African park of Kgalagadi Transfrontier Park (Slotow & Hunter 2009). Managers applied minimal genetic management throughout the history of lion reintroductions (Slotow & Hunter 2009, Trinkle et al. 2010). As a result, geographic genetic structure in the wild-managed lion meta-population reflects mixed origins with few reserves having lions of only one origin (Miller et al. in review). The South African wild-managed lions thus represent a novel lion genetic diversity not associated with a single origin. Maintaining the origin of the base genetic stock is thus, according to the BMP, a low priority (BMP pg. 45).

Hunting and Utilization:

Hunting: According to the 2017 NDF (the last assessment available to the Service), hunting of wild lions is not allowed within national parks and only limited hunting is allowed in some provincial reserves, effectively ensuring protection for the majority of wild lions. There is some harvest of wild lions for the control of problem animals (e.g., stock-raiding) and, in very limited cases, population management within the national parks. In addition, a small number of wild lions from Kruger NP have dispersed out of the park into some of the reserves surrounding the park and may be harvested. According to the BMP, fewer than 2 wild lions and only approximately 10 wild-managed lions are taken off of private reserves annually.

South Africa has not set a specific annual quota for wild-managed lions. Instead, according to information provided to the Service, authorizations for hunting wild-managed lions are addressed on a case-by-case basis. Reserves maintaining wild-managed lions must submit an application to the provincial authorities requesting a permit. Professional Hunters are obliged to record all completed hunts in a professional hunting register and this register is used to compile provincial reports on the number of lions taken annually. The level of off-take is also evaluated in the management of the meta-population to ensure that only those animals that no longer meet

management goals are removed from the population. These animals are typically older lions that have successfully bred and raised several litters of kittens. Most experts consider the recommendation by Packer *et al.* (2011, p. 151) to limit offtake to no more than 1 lion per 2,000 km^2 to be a sustainable offtake of lions. The BMP (pg. 29) has established more restrictive limits for areas of less than 1000 km^2 to not exceed 0.5 lions/1000 km^2.

Utilization: An active lion bone trade from South Africa to several Asian countries for traditional medicinals is primarily supplied from captive-bred lions taken as hunting trophies, as well as captive-bred lionesses and juvenile lions (BMP pg. 30; 2017 NDF pg. 13). Lion bones are being used as a substitute for tiger bones, which is highly valued in Asia, primarily in China and Vietnam (Williams et al. 2015, pg. 1; Gratwicke et al. 2008, pg. 2–5; Graham-Rowe 2011, pg. s101–s102). In 2008, South Africa began issuing CITES permits for the export of skeletons of captive-bred lions to Asia. The number of lion skeletons for which South Africa issued permits for export to Asia (China, Viet Nam, Thailand and Lao PDR) increased tenfold from 2008 to 2011, from about 50 to about 573 skeletons, respectively, representing a total of 1,160 skeletons or about 10.8 metric tons (11.9 US tons) of lion bone in 4 years (Williams 2015, pp. ix–x, 46). With respect to meeting demand for lion bone, Lindsey et al. (2012, p. 20) states that there are likely to be large numbers of lion bones available for export from game farms, from lionesses and non-trophy males, and as byproducts from animals shot as trophies. In addition, Williams et al. (2015, p. 41) reports that there may be between 1,400 and 6,200 lion skeletons from past trophy hunts on South African game farms that could potentially be used to supply demand for lion bone. Further, at the 17th Meeting of the Conference of the Parties, the Appendix II listing for P. leo was amended to include an annotation establishing an export quota for lion bones. The annotation states that "[A] zero annual export quota is established for specimens of bones, bone pieces, bone products, claws, skeletons, skulls, and teeth removed from the wild and traded for commercial purposes. Annual export quotas for trade in bones, bone pieces, bone products, claws, skeletons, skulls and teeth for commercial purposes, derived from captive breeding operations in South Africa will be established and communicated annually to the CITES Secretariat." The Service is aware of a press release from the Endangered Wildlife Trust in which they state the DEA has established a quota of 800 skeletons (with or without skulls) of captive-bred lions for international trade, and as of this finding, the CITES website shows that as of January 17, 2018, South Africa has communicated a 800 skeleton export quota for 2017 to the CITES Secretariat. There is no quota listed for South Africa for the export of lion skeletons for 2018.

The BMP suggests that the value of bones, whether wild or captive-bred, is not high enough to stimulate the illegal harvest of lions solely to sell the bones into the bone trade. However, there is the potential that if the value of bones increases due to increasing demand from Asian markets, that captive-bred lions could be a legal source of bones that masks the illegal harvest of wild lions. According to Williams et al. (2015, p. x), the 2013 price paid to South African game farmers and landowners for lion bones was $1,260–2,100 USD per skeleton. In many lion range states, this exceeds per capita GDP (gross domestic product) (World Bank 2015, unpaginated). Thus, the current price paid for lion bones may provide an incentive in some countries to poach wild lions. While the lion bone trade appears to currently be based primarily in South Africa's captive-bred lion hunting industry, the trade appears to be having little or no impact on wild lion populations in South Africa at this time—lion populations in South Africa are stable or increasing and there is little

poaching of wild lions in the country (Funston and Levendal 2014, pp. 1, 26; Williams et al. 2015, pp. 79–80).

Evaluation:

As stated earlier, the Service has evaluated this application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild-managed lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

While there is habitat available to lions on the national parks and within the smaller, fenced reserves, much of South Africa has been converted into agricultural uses, managed plantation forests, human developments, or extractive industries. With the legalization of private ownership of wildlife in the early 1990s, there has been a significant increase in private land set aside for wildlife. This has led to a boost in South Africa's wildlife, particularly large mammals. South Africa laws, such as ToPS, were put into place to ensure that utilization of this wildlife is sustainable and provides for long-term incentives to maintain these areas for wildlife protection. The national parks and fenced reserves are natural areas surrounded by developement. It is only through the on-going management of these remaining natural areas that lions survive in South Africa. South Africa's management of wild and wild-managed lion population as a meta-population, using human intervention (e.g., translocation) as a substitute for natural occurrences (e.g., dispersal), is ensuring that lion populations are genetically healthy and viable.

While it has been stated that South Africa's hunting industry generates $1.1 billion annually, not all of this is connected to lion hunting or to United States hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and a draw for United States hunters, such as Mr. Whitworth, to South Africa. Based on the information available to the Service, the presence of private reserves has increased the number and diversity of wildlife in South Africa, thus fueling the hunting industry, which funds the on-going success of private reserves. It appears that without the hunting industry, these reserves, which have become islands of wilderness surrounded by civilization in much of South Africa, would not be economically viable, and therefore would not exist. Both ToPS and the BMP have put into place mechanisms to adequately oversee the harvest of wild and wild-managed lions in South Africa. With an annual harvest of approximately 10 wild-managed lions, South Africa is not exceeding the limits identified in the BMP of 0.5 lions/1,000 sq. km. The objectives of the BMP and the actions and

monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that South Africa has established for managing lions.

Therefore, based on the information available to the Service and seeing that Umbabat Private Nature Reserves has been determined by the DEA to maintain a wild-managed lion population, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The national management plan, the BMP for lions is extensive and addresses many aspects of lion conservation and management. As reviewed above, the BMP provides a history of the relevant legislation with regards to lion conservation and puts the current efforts into context. The BMP also reviews the species' biology, population status, habitat requirements, and threats to lion populations. Objectives for conservation of the species, as well as a plan to develop a meta-population for wild-managed lions, are also included. Additionally, the monitoring plans have scientifically sound methodologies. Lastly, but equally importantly, are the monitoring and evaluation efforts laid out in the BMP.

In evaluating the information provided by the South African government and other sources, it appears that the hunting program in South Africa is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The fenced reserves, including Umbabat Private Nature Reserves and national parks are maintaining habitat for lions and ensuring that there is no further habitat loss, provided that the reserves can remain economically viable. In order to maintain a viable population of wild and wild-managed lions, the parks and reserves must maintain biodiversity and a sustainable prey base. Finally, while there is still controversy over the extensive utilization of fencing in South Africa, it does reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions on these reserves and, the limited hunting of lions under this management program contributes to the on-going survival of the species in South Africa.

The off-take of this wild-managed lion provides an indirect benefit to wild populations by helping to support the reserve where lion populations participating in the meta-population management are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, South Africa is closely monitoring and controlling the harvest of wild and wild-managed lions through permitting under ToPS and through the BMP. The issuance of an import permit for a wild-managed lion legally hunted in Umbabat Private Nature Reserves under these authorities would not conflict with any programs intended to enhance the survival probably of the species in South Africa.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted wild-managed lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

As previously stated, wild lions only occur in a limited number of national parks in South Africa and wild-managed lions are currently found on 45 reserves of less than 1,000 sq. km. While the wild lions on the national parks receive only limited direct management activities, the reserves require management that is more intensive in order to mimic natural biological and ecological roles of lions. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the presence of these reserves, including Umbabat Private Nature Reserves, as well as the parks, is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. While the concept of lions behind fences has both benefits and drawbacks, it appears to be a major contributor to the on-going survival of lions in the wild in South Africa. While open and unmanaged habitat not impacted by human intervention would be the ideal conditions for lion populations in South Africa, as well as throughout its natural range, this is not a viable option within South Africa.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt that Mr. Whitworth wishes to undertake in will contribute to reducing the threat of extinction of lions in South Africa. It appears that the permitting activities under ToPS and the implementation of the BMP will ensure the long-term survival of lions. The utilization of hunters such as Mr. Whitworth in managing the populations on theses reserves is an important element of the success of lion management in South Africa.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduced the threat of extinction facing lions in South Africa.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions, but particularly captive-bred lions. However, this opposition, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that the legal harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

Based on our understanding of the permitting process under ToPS, reserves that maintain wild-managed lions must establish biodiversity plans for managing the reserve that takes into consideration the long-term survival of all species on the reserve, including large predators. This oversight by DEA and the implementation of the BMP establishes a framework in which reserves manage their wildlife. The long-term survival of lions, at least in South Africa, is tied directly to the success, both ecologically and economically, of the reserves. The reserves that have been permitted to maintain wild-managed lions and, as part of the management program, carry out limited hunting, have the expertise and facilities to maintain lions successfully. This includes Umbabat Private Nature Reserves, which is confirmed to be part of the ANRP, and a participant in the meta-population management of wild-managed lions.

Therefore, based on the information available to the Service, the applicant intends to hunt on a properly permitted reserve that carries out their management practices in accordance with national and provincial regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective states in the application.

Conclusion

Given the current status of wild and wild-managed lions within South Africa and the level of management and oversight provided to them, it appear that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant intends to hunt on a properly licensed reserve that is actively managing lions in a manner that will maintain the species on the reserve, and through the national meta-population management plan, in a manner that mimics natural processes.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild-managed lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild-managed lion trophy taken in South Africa, to Kenneth (b) (6) Whitworth, Hardinsburg, KY.**

Emma Nelson 6/7/18
Emma Nelson, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/7/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION SOUTH AFRICAN ESA TROPHY

Permit Number: MA83426C-0

Effective: 06/07/2018 Expires: 06/06/2019

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

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KENNETH (b) (6) WHITWORTH
(b) (6)

HARDINSBURG, KY (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 2018 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of South Africa for the 2018 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).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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January 16, 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 the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

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

Sincerely,

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

RCVD FEB 2 2018

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 one 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:

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: Kerrigan R Waibel

Name: Kerrigan R Waibel

Date: 12/27/17

Department of the Interior
U.S. Fish and Wildlife Service FEB - 2 2016

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
WAIBEL	KERRIGAN	R.	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
POWELL BUTTE	OR	(b) (6)		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: UN SURE OF PERMIT # 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.

Kerrigan R Waibel

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.

      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:

   b. Date wildlife is to be 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

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):

      Zambia, Mumbwa West Game Management Area, GIS: S15 04 01.5; E 026 08 36.9

   b. Date wildlife was hunted:

      July 14, 2017

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

Full skin, skull, teeth, claws, floating bones.

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]:

Plot 10549, Lumumba Road, Lusaka, Zambia.

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:	Mangomba Safaris
Business Name:	Mangomba Safaris
Address:	Plot 2170/M
Address:	Leopards Hill Road, PO Box 30084,
City:	Lusaka
State/Province:	Central Province
Country, Postal Code:	Zambia

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, Zambian authorities, Zambian operators, and others.

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: Kevin R Wassel Date: _____

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.

ENHANCEMENT REPORT

MANGOMBA SAFARI COMPANY, LTD.
Plot 2170/M Leopards Hill Road, Box 30084, Lusaka.
mangombasafaris@yahoo.com
Mumbwa West Game Management Area, Zambia

I. DESCRIPTION OF COMPANY AND CONCESSION

Mangomba Safari Limited has been operating in West Mumbwa Concession since April 2016 after a ban for almost three years. The concession is 1,441 km² and provides habitat for a range of species including buffalo, lion, leopard, hippo, waterbuck defassa, kudu, roan, eland, reedbuck, oribi, impala, bushbuck, hyena, warthog, zebra, hartebeest, and sable (lion and lion prey). Our concession is in the West Mumbwa Safari Area and it has been categorized as a prime area by our Wildlife Authority. We have a lease with the Wildlife Authority for seven years, renewable.

Our company is family-owned and has been operating in this country for 14 years. We employ three professional hunters, four game trackers, twenty-five anti-poaching scouts, and six camp staff (cooks, waiters, cleaning, miscellaneous). **Altogether our operations support at least 100 dependents in local villages.**

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

II. ANTI-POACHING COMPONENT

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

A. Law Enforcement

Mangomba Safari Limited is very much aware that law support enforcement is very cardinal, to enable the officers from the Wildlife Authority on the ground carry out patrols in order to ensure the hunting block is well protected from poaching activates. To this effect the outfitter

has committed to pay the sum of $51,176.00 to be shared among the three Community Resource Boards in the area.

B. Fire Management

The outfitter is committed to pay the sum of US$2,222.00 towards the management of fire in the hunting block. The outfitter has further committed to provide transport to assist the department of wildlife and the community to curb fires and management of early burning activities.

C. Scouts Management

We supply rations once per month to the scouts to ensure they are sufficiently equipped for the patrols.

Since operations from late April 2016, no elephants were seen and we only found one dead elephant. During the opening season of 2017, we have physically seen elephants and a lot of movement in and around the camp. Physical presence of the scouts in and around the camp has made a positive response.

From late November 2016 to date:

Item	Spend (USD)	Notes
Scout salaries	750.00	Law enforcement, fire control
Scout equipment	-	Infrastructure development,etc
Diesel / petrol	1,000.00	Total contribution: $30,000.00
Rations for WA and community scouts	500.00	
Wage for the driver	250.00	
Wages for monitoring team	250.00	
TOTAL	2,750.00	

D. Distribution of meat to the Community

The outfitter also distributes edible carcasses to the community as a measure to reduce poaching by the community. A minimum of 50% of hunted meat is distributed to the community and it is shared amongst them through their community resource boards by a liaison officer who is employed by the outfitter.

E. Road Clearance

The outfitter also sends out road crews approximately every two weeks to check the condition of the roads in the concession, as a way of ensuring that the patrol of the area is done effectively.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

Mangomba Safari Limited is committed to pay about US$51,176.00 to be shared among three community Resource Boards in equal amounts of US$17,000.00 per community Resource Board to be reviewed after every hunting season.

The outfitter has further committed to pay the sum of about US$5,882.00 towards infrastructure development and maintenance. In the foregoing, the outfitter has agreed to rebuild two dilapidated camps at Kachekeleko and Nangoma. Nangoma will be constructed as a fly camp. The construction of the camps will be Kachekeleko in the second year and then Nangoma respectively to ensure that the camps are completed before the end of the concession for the outfitter. Further the outfitter is also committed to pay a US$5,882.00 towards the resource monitoring to enable that all the available resources on the ground are well monitored.

IV. OTHER INFORMATION

Prey Base

Mangomba Safari Limited's anti-poaching efforts and fire management have allowed the lion and Leopard prey base in our concession to grow over the past year. We estimate that our plains game (kudu, sable, etc.) will increase by 10%.

Lion and Leopard Population Tracking

Lion and Leopard are notoriously difficult to survey or census. To track the Feline population trend in our concession, ABC Safari Company maintains a Google Earth database of both Lion and Leopard sightings and tracks. We record sightings, spoor, or footprints and as much data is known on the individual. Because we keep tabs on both feline species in our concession, we are assured that the regulated, limited offtake is sustainable.

Lion and Leopard Aging Approach

Mangomba Safari Limited has been following an age-based policy for African lion trophies since 2016, we have adopted a company rule not to harvest lion below six 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. We successfully harvested mature (aged six of older) male lion up to our quota (of two).

Lion Hunting Revenue

Lion and Leopard are our highest-value species. We require 21-day safaris for lion and Leopard require 14 day safaris. Our daily rate is $1,800.00 per day, plus a trophy fee of $15,000 (lion) and $6,500 (Leopard).

We generate approximately 85% of overall revenue from lion and Leopard hunts, and approximately 50% of our annual revenue from lion hunts alone.

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

Mangomba Safari Limited 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.

All Lion and Leopard hunts are studied and scrutinized on camera to determine their age and size before they are actually shot.

Lions are seen on almost daily basis indicating a healthy growing population. Only 1 Lion is on quota.

Signed: _____

Operator Name: Mangomba Safaris Limited

Title: Director

REPUBLIC OF ZAMBIA

The Zambia wildlife Act
(Act No 12 0f 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

NON RESIDENT HUNTING LICENCE Nº 18808

(Regulation 3 (2)

Station of issue: Chilanga Date of issue: 06/07/2017

DETAILS OF LICENSEE

Full Name: KERRIGAN R WAIBEL NRC/Passport No

Nationality: Tel/Fax

Addrsss:

Full Name of Safari company: Mwiganka Safaris

Company Cert. Incorporation No.: Date of incorporation

Postal Address: Box 30084 LSK

Residential Address:

Firearm Licence/Tourist's Firearm import No: ...Caibre of Firearm(s):

Type of Hunt: Hunting Block:

The above named Safari company and its bona fide Clients are authorised by this licence under the Guidance of a Professional hunter to hunt the follwing Game or Protected animals within the Game Management Area or hunting block Specified hereunder and for the specified period and upon payment of the fees specified below

Species of animal	Number	Sex	Hunting Area	Hunting Period	Fees US$
Lion	1	M	Mumbwa	2017	
			West		
				Total Animals Fees	
				Concession Fees	
				Grand TOTAL	

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 6 JUL 2017
PRIVATE BAG 1 CHILANGA

Note:
Original copy to be retained by the Licencee
Duplicate copy to be forwarded to the Director - General or to an agent
Triplicate to be retained in the book

Date 06/07/2017

Director General

No. 12219

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name: MARK A. SWANEPOEL NRC/Passport No (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return: MANGOMBA SAFARIS

DETAILS OF CLIENT

Full Name: KERRIGAN R. WAIBEL NRC/Passport No (b) (6) [redacted]

Postal Address: C/O MANGOMBA SAFARIS

Non Resident Hunting Licence No: 23746 Date of issue: 06/07/17

Name of Hunting block hunting was conducted: MUMBWA WEST GMA

Hunting period: 08/07/17 to: 31/07/17

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export Yes	Trophy for Export No	Foreing currency valu charged to client
09/07/17	PUKU / M	01	—	S15°0953.5 E25°5852.5	✓	Lic	18813
09/07/17	IMPALA / M	01	—	S15°0953.4 E25°5852.3	✓	Lic	18814
11/07/17	WATERBUCK / M	01	—	S15°0418.5 E26°1004.4	✓	Lic	18811
14/07/17	LION / M	01	—	S15°0401.5 E26°0836.9	✓	Lic	18808

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
PUKU			17"
IMPALA			16"
WATERBUCK			28"
LION			

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amount
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. Including overheads & Extras		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DG for animals, Licences and Hunting rights.		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Resident Hunting Licence & that the foreign currency stated above is the full amt. Paid by the client for the hunt

Date: 29/07/17 Signatures: Client

Professional Hunter

Wildlife Police Officer

White copy to the Director General ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

LEOPARD AND LION HUNT RETURN FORM

Each animal hunted should be accompanied by a separate data sheet and all measurements should be in metric units)

Name of Professional Hunter: MARK A SWANEPOEL	Monitoring Scout	Rank:

DETAILS OF CLIENT

Name of client: KERRIGAN R. WAIBEL	Nationality: USA
Country of Residence:	USA
Address: USA	

GMA permit No.: 23746	Non Resident Hunting Licence No: 18808

DETAILS OF HUNT AND TROPHY MEASUREMENTS

Name of GMA: MUMBWA WEST	Hunting period	
Name of Hunting Block: MUMBWA WEST	From (Date): 08-07-17	To (Date): 31-07-17

Date Killed or wounded	Species	Killed or Wounded	Sex (Tick)		GPS Location (in decimal degrees - hddd.ddddd)	
					Latitude	Longitude
14-07-17	LION	KILLED	Female	Male ✓	S15°04 07.5	E026° 08 36.9

Date measured (DD/MM/YY)	Total length (Nose to tip of tail - cm)	Tail length (cm)	Shoulder height (Shoulder to base of paw in cm)	Skull length (cm)	Skull width (cm)
24-07-17	275 cm	95 cm	187.5cm	39.375 cm	23.75 cm

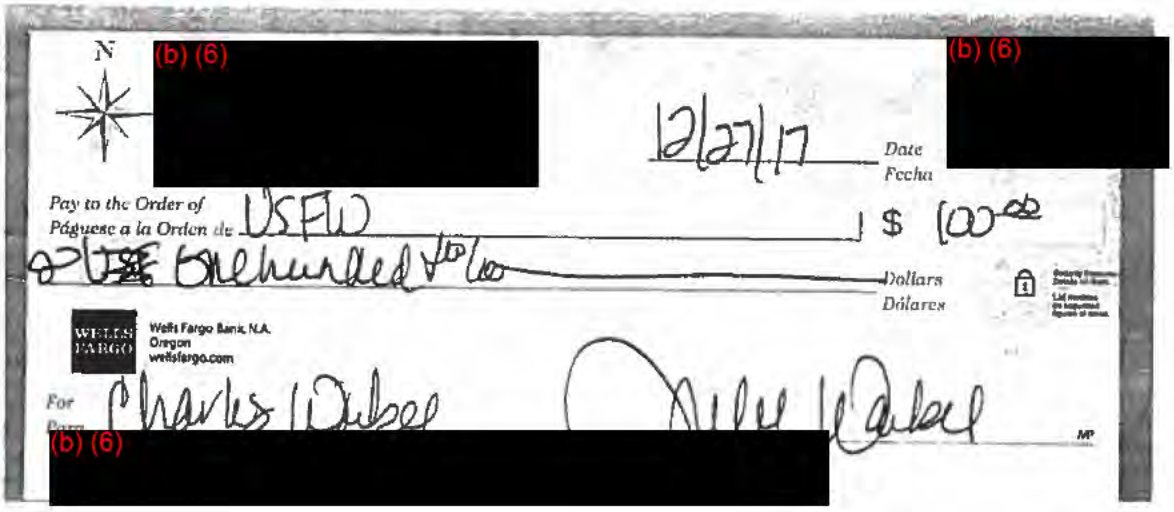
PHOTOS & SAMPLES (tick in space provided for photos & samples taken)

1. Whole body from the side*	✓	7. Teeth before cleaning (front & side)*	✓	12. Ridges on back of Lower canines	
2. Mane from the top*	✓	8. Teeth after cleaning (front & side)	✓	13. Tissue samples taken	
3. Face & head from the top*	✓	9. Lower Jaw from side	✓	14. Premolar extracted	
4. Face & Chest*	✓	10. Ridges on back of Upper Canines			
5. Nose*	✓	11. Whisker spots (Right & Left)	✓		

* These photos should be taken at kill site before skinning and in as good of light as possible. Teeth and nose should be blood and dirt free to provide clear assessment

DATA RECEIVED BY:	DATE:	SIGNATURE:

RCVD FEB 2 2018


N

(b) (6) [redacted]

(b) (6) [redacted]

12/27/17

Date
Fecha

Pay to the Order of
Páguese a la Orden de USFW

$ 100.00

One hundred dollars 00/100

Dollars
Dólares

WELLS FARGO

Wells Fargo Bank, N.A.
Oregon
wellsfargo.com

For
Charles Dubee

(b) (6) [redacted]

MP

Vargas, Darcy <darcy_vargas@fws.gov>

75473C / Lion Trophy Import

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Jun 7, 2018 at 5:04 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>, jjw-no <jjw-no@att.net>

Dear Mr. Jackson and Ms. Lennox,

Ref: 75473C

Upon further review of the referenced application, it was noticed that page 1 of the application was not dated. Therefore, please provide an updated application, with an original signature and date (no photocopies), along with the previously requested documentation on the lion's age.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by July 22, 2018, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Regards,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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Vargas, Darcy <darcy_vargas@fws.gov>

75473C / Lion Trophy Import

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Jun 7, 2018 at 4:36 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>, jjw-no <jjw-no@att.net>

Dear Mr. Jackson and Ms. Lennox,

Ref: 75473C

The referenced application request to import one male African lion trophy from Mangomba Safari Company, LTD, in Mumbwa West GMA, Zambia, is under review. However, in order to complete processing your application, we need additional information. Therefore, please provide the following:

1. Provide documentation that shows the age of the lion you are requesting to import.

In accordance with 50 CFR 13.II(e), if the requested information is not received by this office by July 22, 2018, (45 calendar days of the date of this email), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
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United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-C75473C

Enhancement Finding
Applicant: Kerrigan R. Waibel (PRT-75473C)

Kerrigan R. Wabel submitted an application on February 2, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 14, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively,

except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import

of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Waibel's application involving a *P. l. melanochaita* sport-hunted trophy taken in Mumba West GMA, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Waibel's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Waibel's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Waibel's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Waibel's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Waibel will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Waibel, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Waibel.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Kerrigan R. Waibel.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA75473C-0
Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

KERRIGAN R WAIBEL
(b) (6)
POWELL BUTTE, OR (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia 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).

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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

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January 16, 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 the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

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

Sincerely,

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

RCVD FEB 2 2018

December 28, 2017

U.S. Fish & Wildlife Service
Attention: Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Federal Fish and Wildlife Permit Application Form 3-200-20
Permittee Thomas Michael Zulim
African Lion – ESA-Threatened-Listed
Zimbabwe Deka Tails Safari Area, Hunting Season 2019

Dear Sir or Madam:

Accompanying this cover letter is my application for the above referenced African lion import permit for the calendar year 2019 hunting season. As noted in the application, the lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe in the specifically noted Deka Tails safari hunting area.

Also, accompanying this application is (i) my check in the amount of $100.00 for the application fee and (ii) a Notice of Representation designating representatives of Conservation Force as my attorneys and legal representatives for all matters concerning this application.

Please let me or the representatives at Conservation Force know if you have any questions or require any additional information.

Sincerely,

Thomas M Zulim
(b) (6)
[redacted]
Hockley, Texas (b) (6)

cc:

Conservation Force
3240 S. I-10 Service Road West, Suite 200
Metairie, LA 70001

Hunter International Brokerage Services, Inc.
5674 Stoneridge Drive, Suite 209
Pleasanton, CA 94588

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:

Name: Thomas M Zulim

Date: December 28, 2017

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

Federal Fish and Wildlife Permit Application Form

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

RCVD FEB 2 2018

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
AFRICAN 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Zulim	Thomas	Michael	NA

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			NA

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [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	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
	NA

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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hockley	Texas	(b) (6) [redacted]		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Hockley	Texas	(b) (6) [redacted]		USA

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)) CHECK ATTACHED. CHECK NO. 4172

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30345C-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): 12/28/2017

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.1. 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:

      See attached E.2.a.

   b. Date wildlife is to be hunted:

      See attached E.2.b.

   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):

      NA

   b. Date wildlife was hunted:

      NA

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

NA

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]:

NA

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:	Andy Hunter
Business Name:	Chipatani Safaris
Address:	8 Rivonia Road
Address:	Mount Pleasant, Harare
City:	Zimbabwe
State/Province:	
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.

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.

NA

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: 12/28/2017

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).
I WILL USE A DESIGNATED PORT.
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):

Same as indicated on page 1.

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.
NA

☐ 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):
Tom Zulim
(b) (6) [redacted]
John L Jackson or Regina Lennox of Conservation Force
jjw-no2@att.net or regina.lennox@conservationforce.org
504-837-1233

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.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.2.a.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019, in Zimbabwe with the safari operator and in the safari hunting area noted below.

Nengasha Safaris

Country:	Zimbabwe
Operators Name:	Nengasha Safaris
Address:	36A Townsend Road, Suburbs, Bulawayo, Zimbabwe
Zimbabwe Tourism Operators HOP number:	0178
Area of hunt/place:	Deka Tails Safari Area, Zimbabwe
Land owners name:	Zimbabwe Parks and Wildlife Authority
GPS coordinates:	Latitude: 18 degrees, 53 feet, 82 inches South Longitude: 26 degrees, 70 feet, 19 inches North
Closest town:	Hwange Town, Zimbabwe
Area:	Matetsi Block, Zimbabwe
Region/Province:	Matabeleland North Province, Zimbabwe
Professional Hunter:	George Hallamore
PH license number:	144 (issued by Zimbabwe National Parks and Wildlife)

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.2.b.

The lion hunt will take place during the period August 1 through 18, inclusive, 2019.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.

a. Please see the information previously provided to USFWS by Conservation Force, Bubye Valley Conservancy, Save Valley Conservancy, and the Zimbabwe authorities, all of which are incorporated herein by this reference.

b. Please see the information accompanying this application, and incorporated herein by this reference, prepared and previously submitted to USFWS by Zimbabwe Parks and Management Authority titled: "*Legal Trade, Conservation and Rural Livelihoods: a Zimbabwean Perspective; - L.W. Nyaguse*".

c. Please see the USFWS Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018, dated October 11, 2017, all of which in incorporated herein by this reference.

d. Please see the information accompanying this application, and incorporated herein by this reference, undated but pertaining to the hunt year 2017, by Paul Bernie, operator of the Deka Tail safari area in Zimbabwe.

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

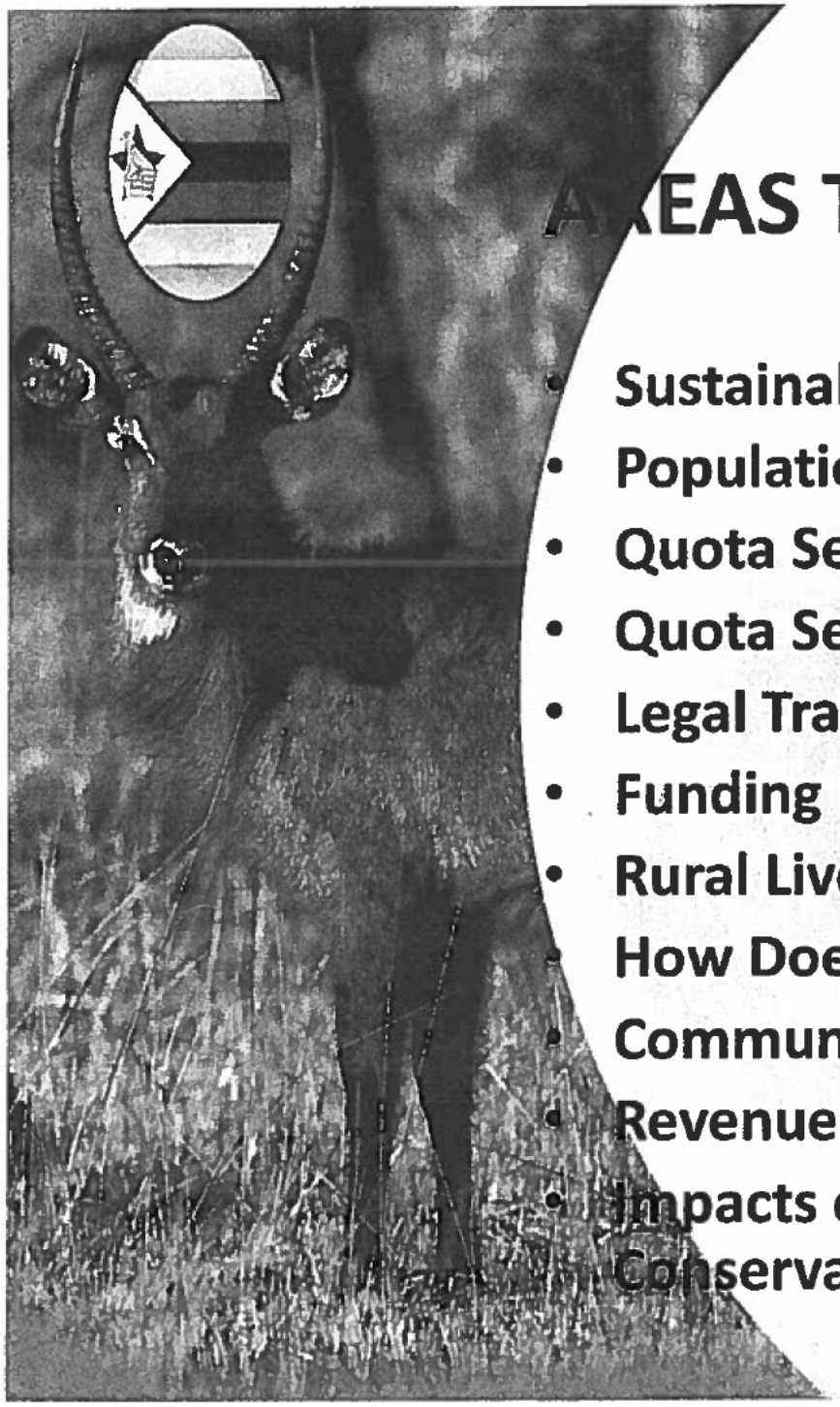
Attachment E.5.b.

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

LEGAL TRADE, CONSERVATION AND RURAL LIVELIHOODS: A ZIMBABWEAN PERSPECTIVE:

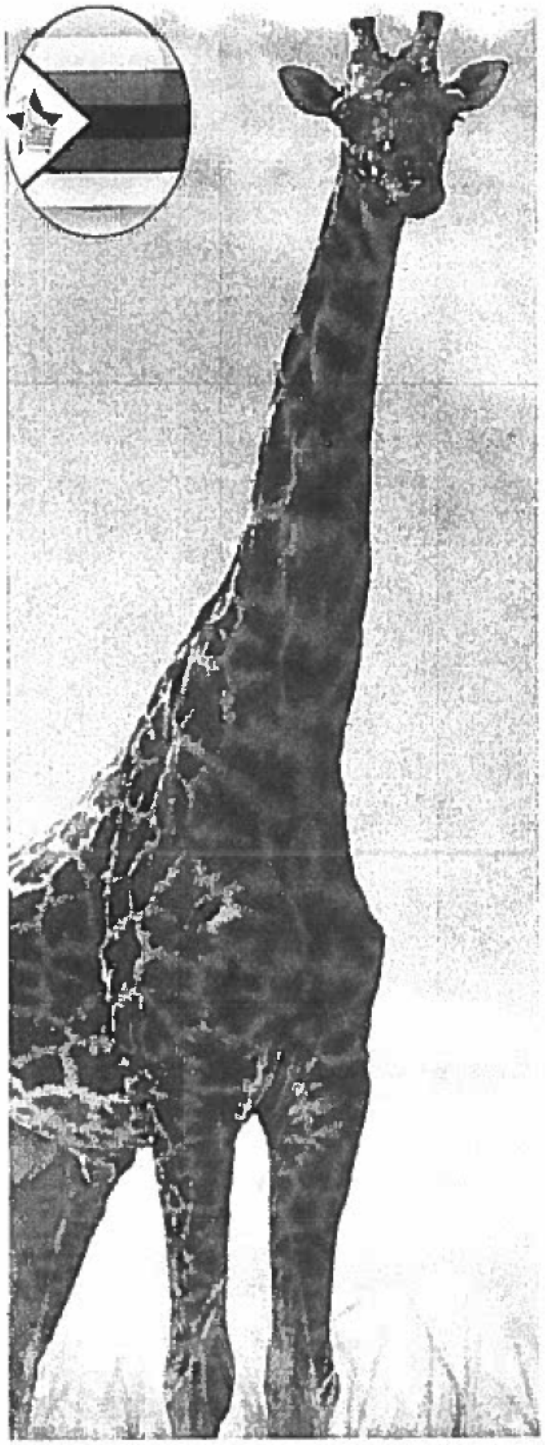
- L.W. NYAGUSE

Attachment E.5.b. 23 pages



AREAS TO BE COVERED

- Sustainable Utilisation
- Population Status of Key Species
- Quota Setting and CITES Quotas
- Quota Setting Considerations
- Legal Trade Framework
- Funding For Conservation
- Rural Livelihoods and Legal Trade
- How Does CAMPFIRE Work
- Community Benefits
- Revenue Generation
- Impacts of Community Benefits on Conservation



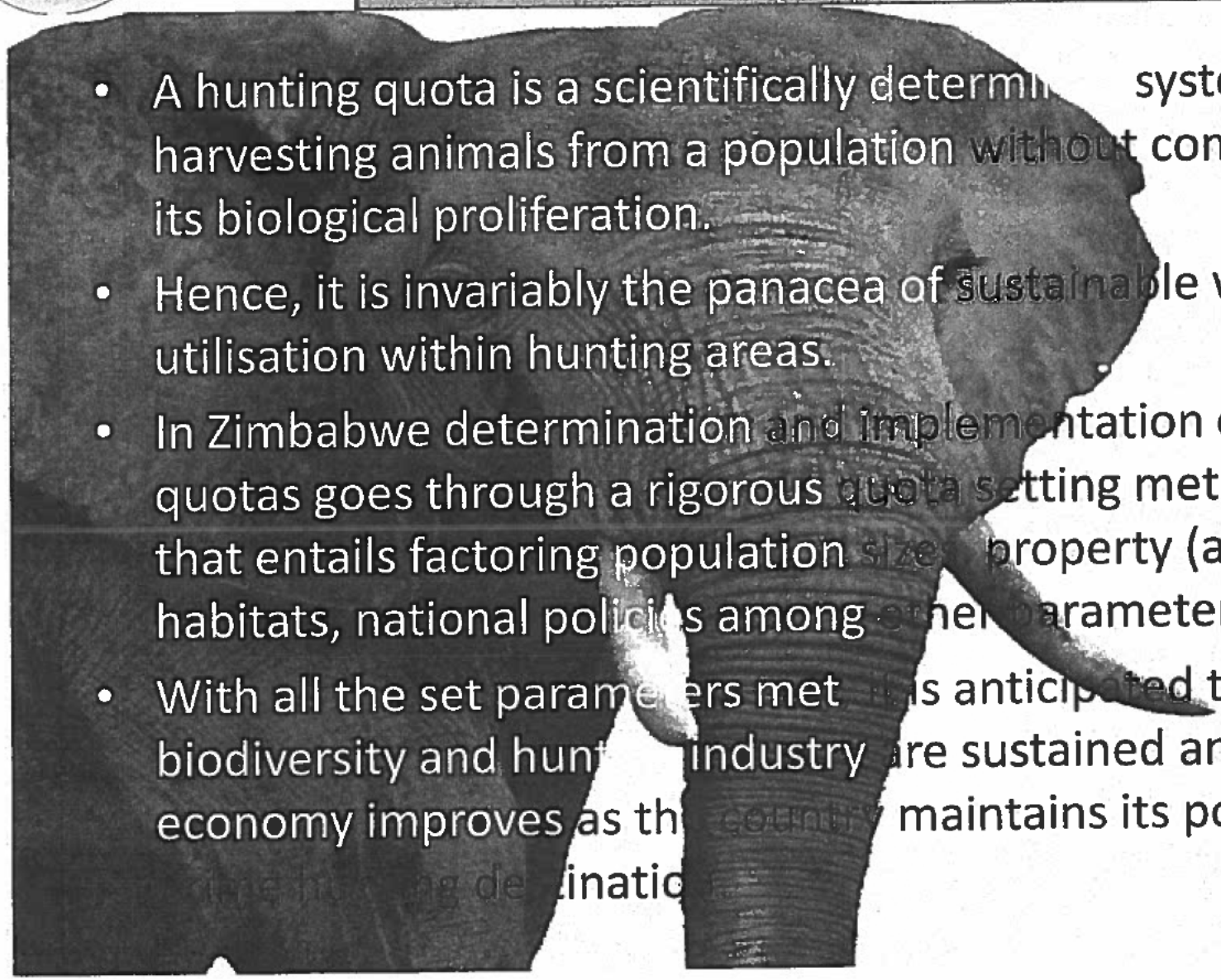
SUSTAINABLE UTILISATION

- Zimbabwe's conservation is based on the principle of sustainable utilisation, that the various species that are being conserved must contribute to conservation. This is the major source of funding for conservation.
- How successful has the concept been?????
- Adaptive management is probably one of the most important concepts in the implementation of this philosophy.

POPULATION STATUS OF KEY SPECIES (ELEPHANTS)

REGION	1980	1983	1989	1993	1995	2001	2014	2001 vs. 2014
North-West Matabeleland	20 444	25 888	27 411	27 841	30 985	49 310	53 949	9.4% increase at 0.7% per annum
Zambezi Valley	10 152	9 907	13 029	14 361	16 842	19 297	12 2 11	36.7% decline at 2.8% per annum
Sebungwe	11 126	9 302	12 946	10 742	11 796	13 989	3 634	75% decline at 5.7% per annum
Gonarezhou	4 704	3 985	5 286	5 241	4 156	4 992	10 722	115% increase at 8.8 % per annum
TOTAL	46 426	49 082	58 672	58 185	63 779	88 123	80 516	8.6% decline at 0.7% per annum

Quota Setting and CITES Quotas



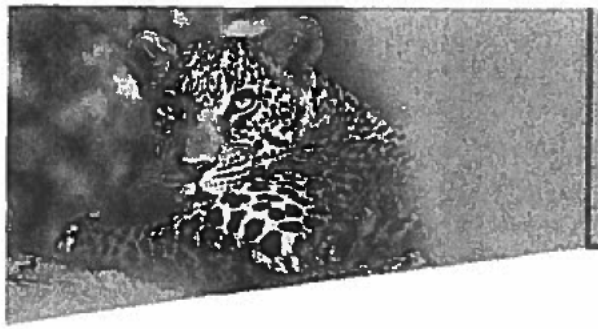
- A hunting quota is a scientifically determi system of harvesting animals from a population without compromising its biological proliferation.
- Hence, it is invariably the panacea of sustainable wildlife utilisation within hunting areas.
- In Zimbabwe determination and implementation of hun quotas goes through a rigorous quota setting methodology that entails factoring population size property (area) sizes habitats, national polici s among other parameters
- With all the set parame ers met is anticipated that biodiversity and hunt industry are sustained and the economy improves as th country maintains its position as a hunting de tinatio

Quotas and Quota Setting Considerations

1. CITES National Quota
2. National aerial survey results
3. Research publications and preliminary results
4. Off takes for key species including leopards, lion and elephant
5. Size of property relative to the species requested and distribution
6. Illegal Off-take/Poaching
7. Property based Ecological assessments
8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
10. Species sensitivity
11. Other off-takes (illegal management offtakes, live sells)
12. Trophy Quality
13. Habitat Change/fragmentation
14. Recommended sustainable off-take levels
15. Offtake Data

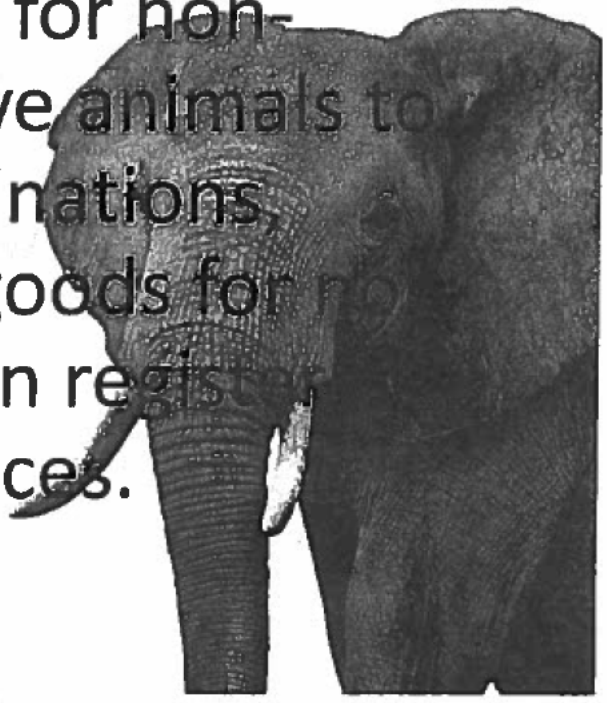
Quota Setting and CITES Quotas

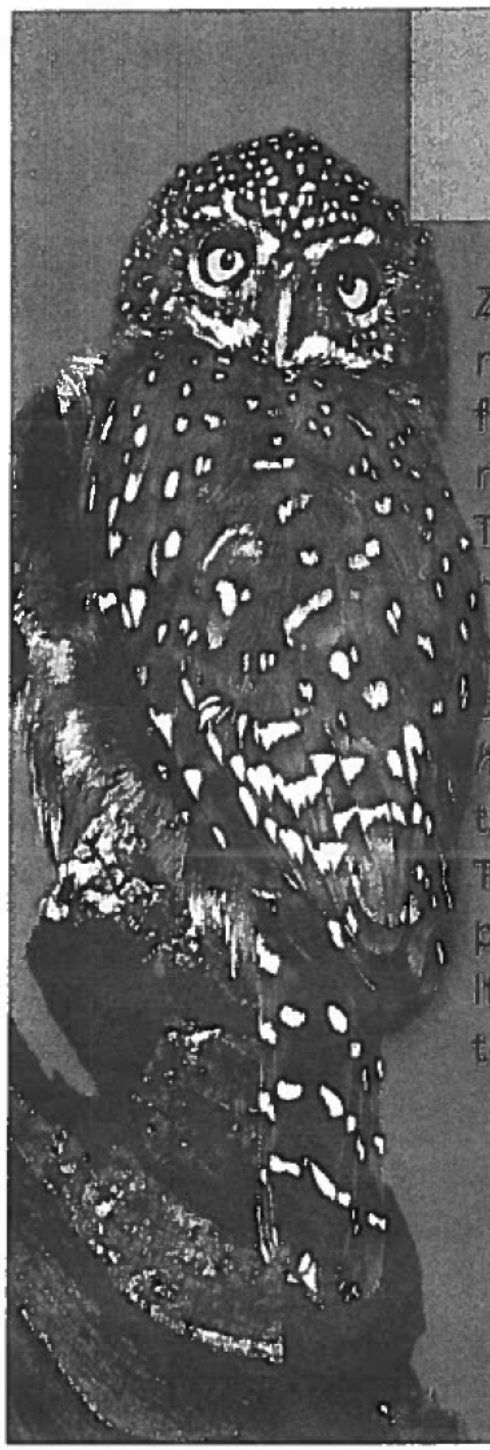
Species	CITES Quota
Elephant	500
Leopard	500
Crocodile	200
Cheetah	50



LEGAL TRADE FRAMEWORK

- Current CITES regulations on trade in elephant and elephant products for Zimbabwe have an annotation affecting Zimbabwe's population of *Loxodonta africana* on Appendix II which restrict trade in hunting trophies for non-commercial purposes, trade in live animals to appropriate and acceptable destinations, trade in hair, hides, and leather goods for non-commercial purposes and trade in registered raw ivory for whole tasks and pieces.





FUNDING CONSERVATION

Zimbabwe's Protected Area Management system is self-funding in nature. This means therefore that the resource protection budget is financed through the sustainable utilisation of the various wildlife resources therein.

The African Elephant is one of the biggest drawcard species from a hunting perspective, and is at the centre of all the major hunts in the country. Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015 (*RBZ Exchange control report on hunting tourism in Zimbabwe*) and contributes about 20% annually of the Authority's revenue budget.

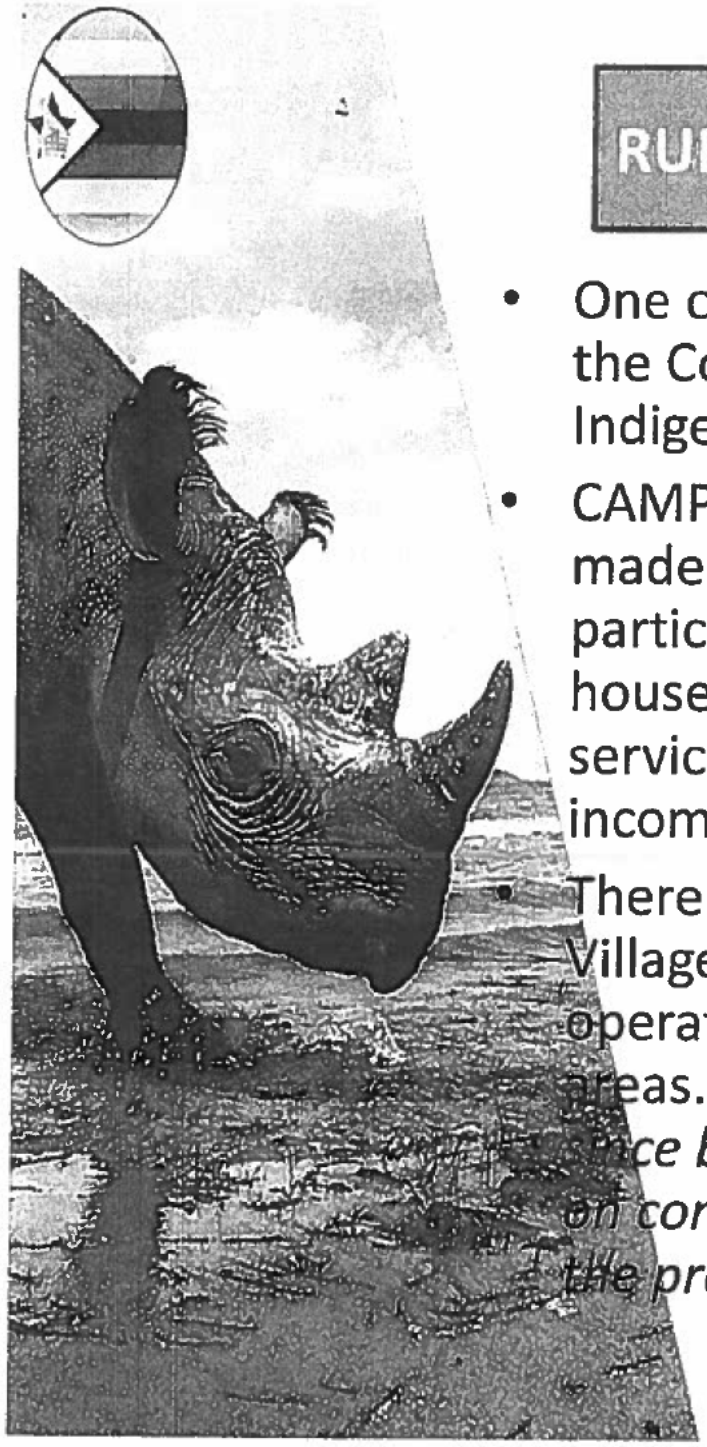
The annual offtake quota provided through CITES is for 500 elephants per annum.

It is the utilisation of these offtake quotas that contribute significantly to Zimbabwe's conservation budget.

FUNDING CONSERVATION

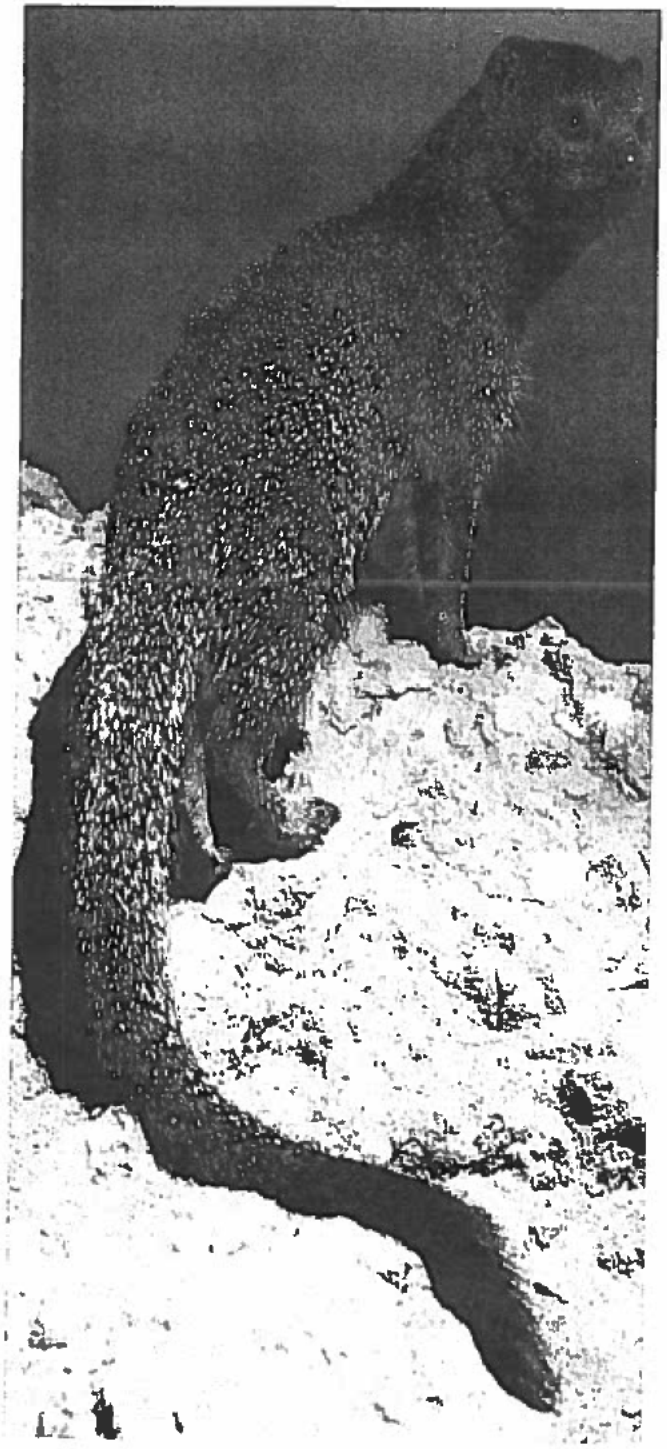
Zimbabwe's Protected Area Management Funding

	2013	2014	2015	2016	2017
	Actual	Actual	Actual	Budget	Budget
	US$	US$	US$	US$	US$
REVENUE					
Hunting Income	5,423,995	5,072,493	3,256,698	4,418,700	3,000,000
Sale of park products/live sales	515,509		810,000		
TOTAL Revenue	**5,939,504**	**5,072,493**	**4,066,629**	**4,418,700**	**3,000,000**
EXPENDITURE					
Operational costs	5,766,886	6,071,981	5,123,926	7,525,500	4,000,000
Staff costs	16,850,007	20,294,821	19,705,931	21,666,800	19,725,000
Administration costs	2,558,886	3,244,961	2,922,619	2,004,900	2,000,000
TOTAL EXPENDITURE	**25,175,779**	**29,611,763**	**27,752,476**	**31,197,200**	**25,725,000**
SURPLUS/ DEFICIT	**-19,236,275**	**-24,539,270**	**-23,685,847**	**-26,778,500**	**-22,725,000**



RURAL LIVELIHOODS AND LEGAL TRADE

- One of the biggest CBNRM initiatives in Zimbabwe is the Communal Areas Management Programme For Indigenous Resources (CAMPFIRE)
- CAMPFIRE has a combined 2.4 million beneficiaries, made up of 200,000 households that actively participate in the program, and another 600,000 households that benefit indirectly from social services and infrastructure supported by CAMPFIRE income within districts.
- There are in excess of 120 elected and constituted Village and Ward CAMPFIRE Committees that operate through specific Traditional Leaders in their areas. *'Communal' in the acronym CAMPFIRE, has since been changed to 'Community' in order to focus on communities instead of the geographic spread of the programme.*



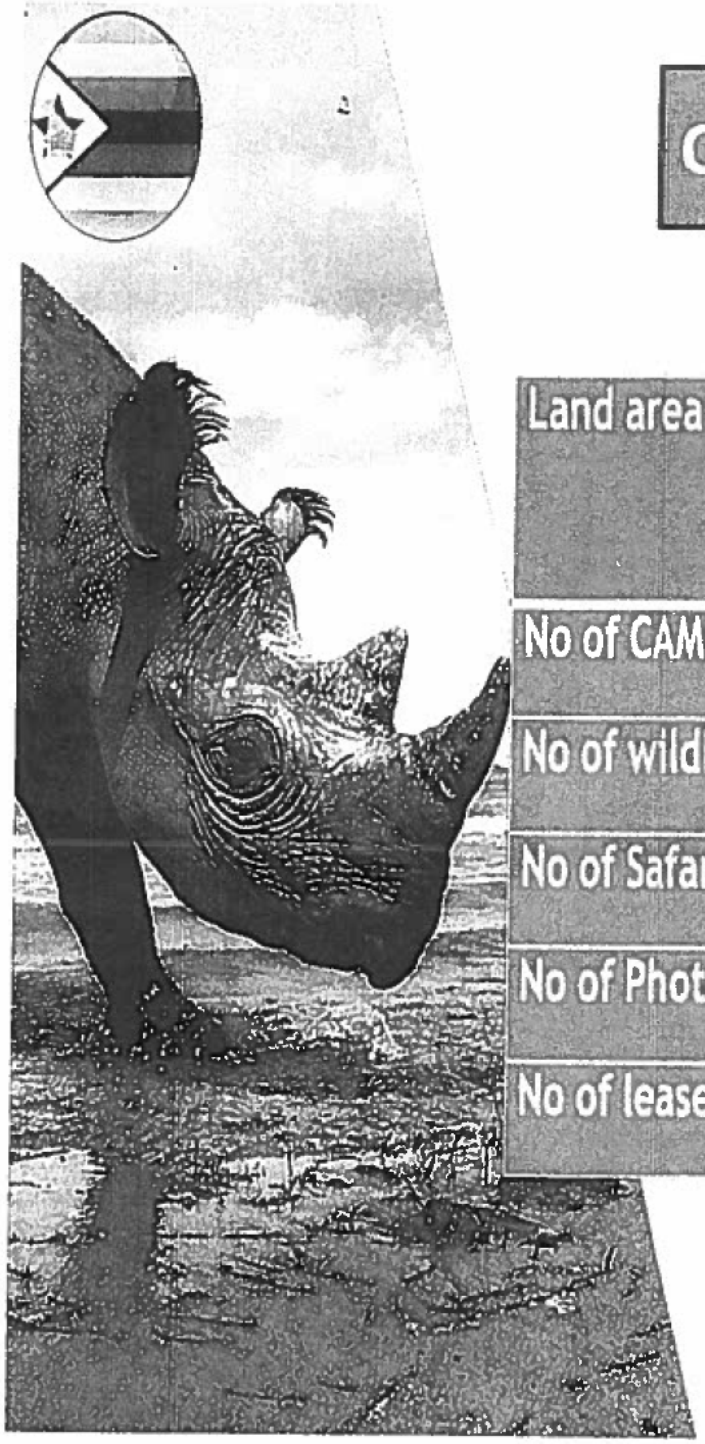
HOW CAMPFIRE WORKS

There are rural communities living adjacent or around most of Zimbabwe's National Parks or Protected Areas. These communal areas are under Rural District Councils (RDCs)

In the 1980s, the Zimbabwean government embarked on a Community Based Natural Resources Management Programme which would empower the rural communities to manage and utilise the natural resources in their districts.

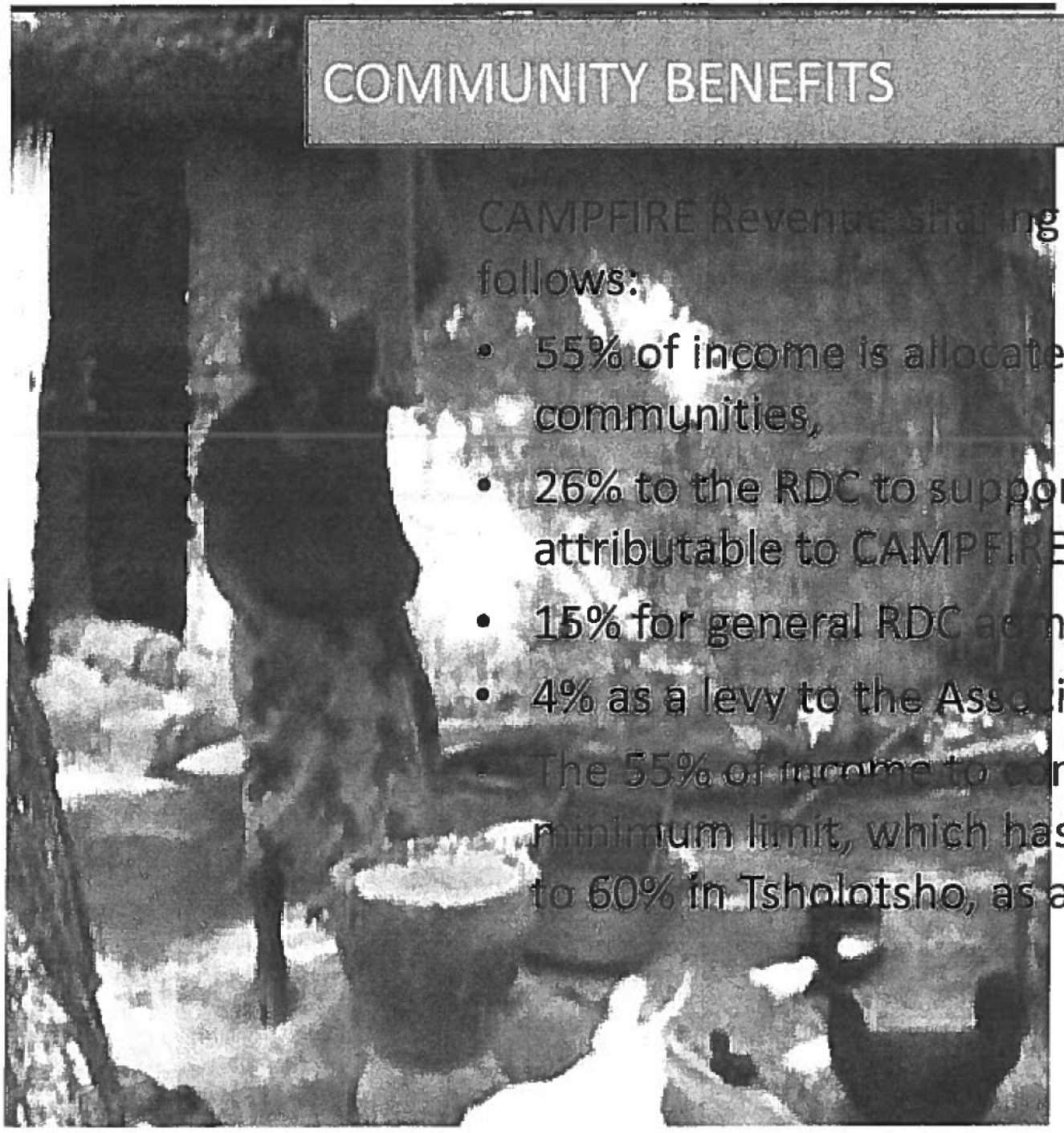
To this end, the communities applied for and were given Appropriate Authority over their wildlife resources. This appropriate Authority meant that they could then embark on empowerment programmes for their own benefit.

All these districts fall under the CAMPFIRE Associatio



CAMPFIRE AREAS

Land area under CAMPFIRE	50,000 km^2 - 12% of Zimbabwe
No of CAMPFIRE Districts	58
No of wildlife districts	28 (15 active in hunting)
No of Safari Operators	33
No of Photographic safaris	10
No of leased Parks Safari Areas	4

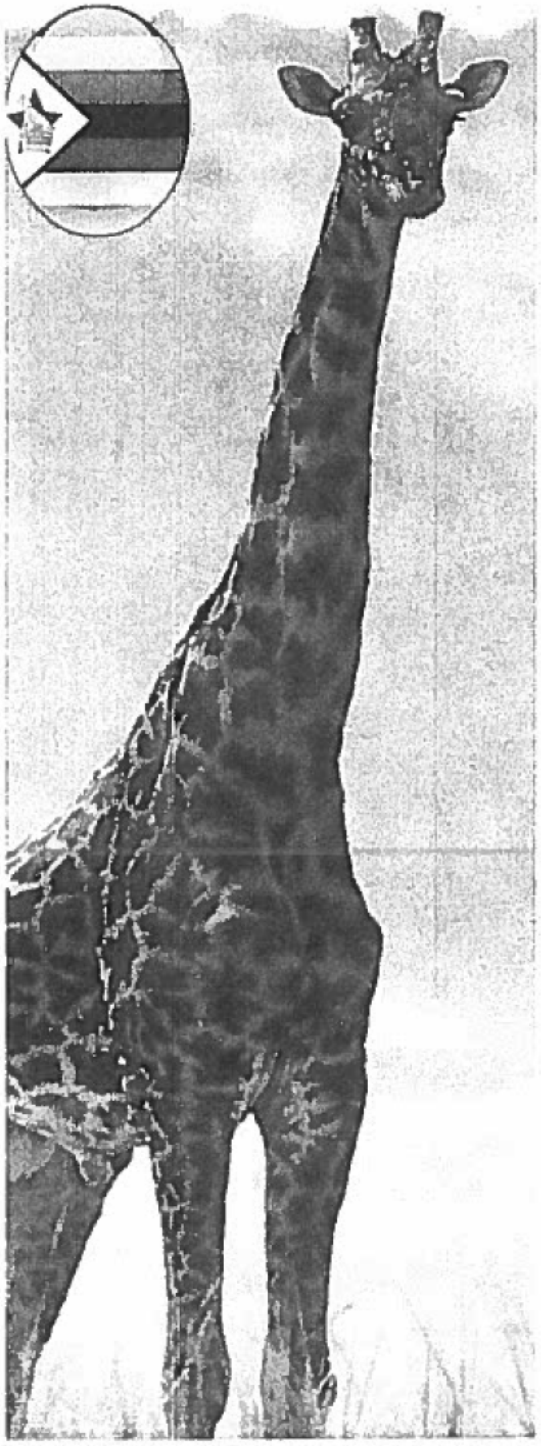


COMMUNITY BENEFITS

CAMPFIRE Revenue sharing Guidelines are as follows:

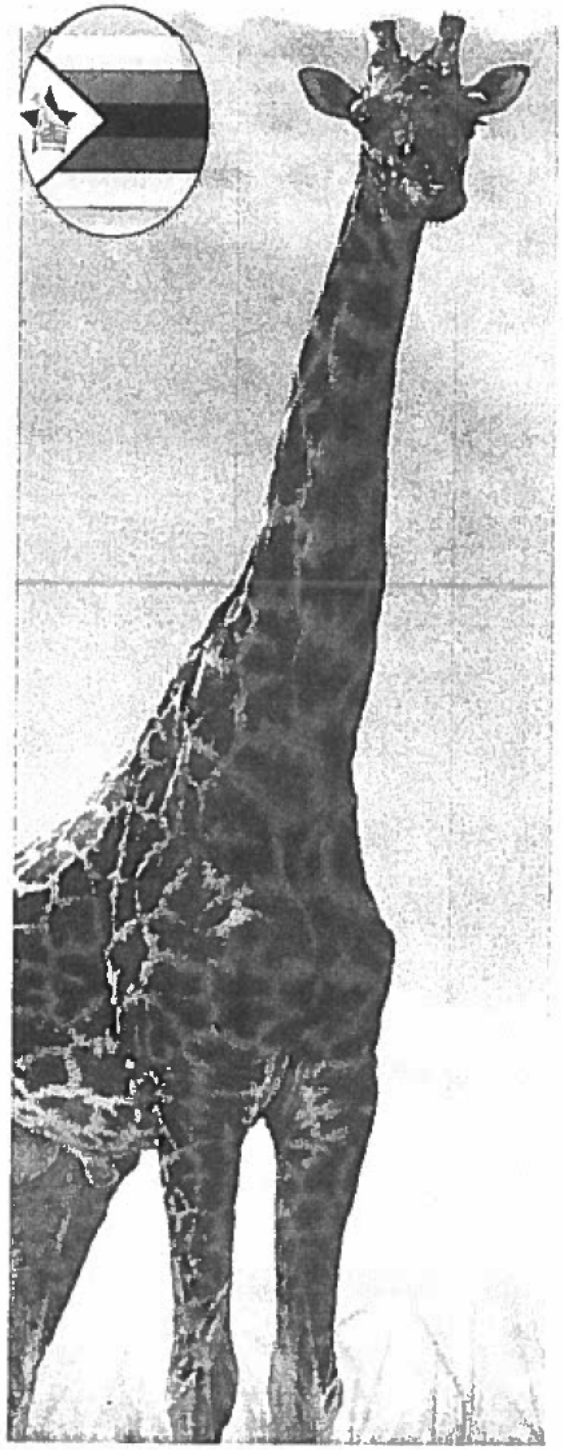
- 55% of income is allocated to communities,
- 26% to the RDC to support costs attributable to CAMPFIRE activities,
- 15% for general RDC administration, and
- 4% as a levy to the Association.

The 55% of income to communities is the minimum limit, which has been exceeded to 60% in Tsholotsho, as an example.



REVENUE GENERATION - HWANGE

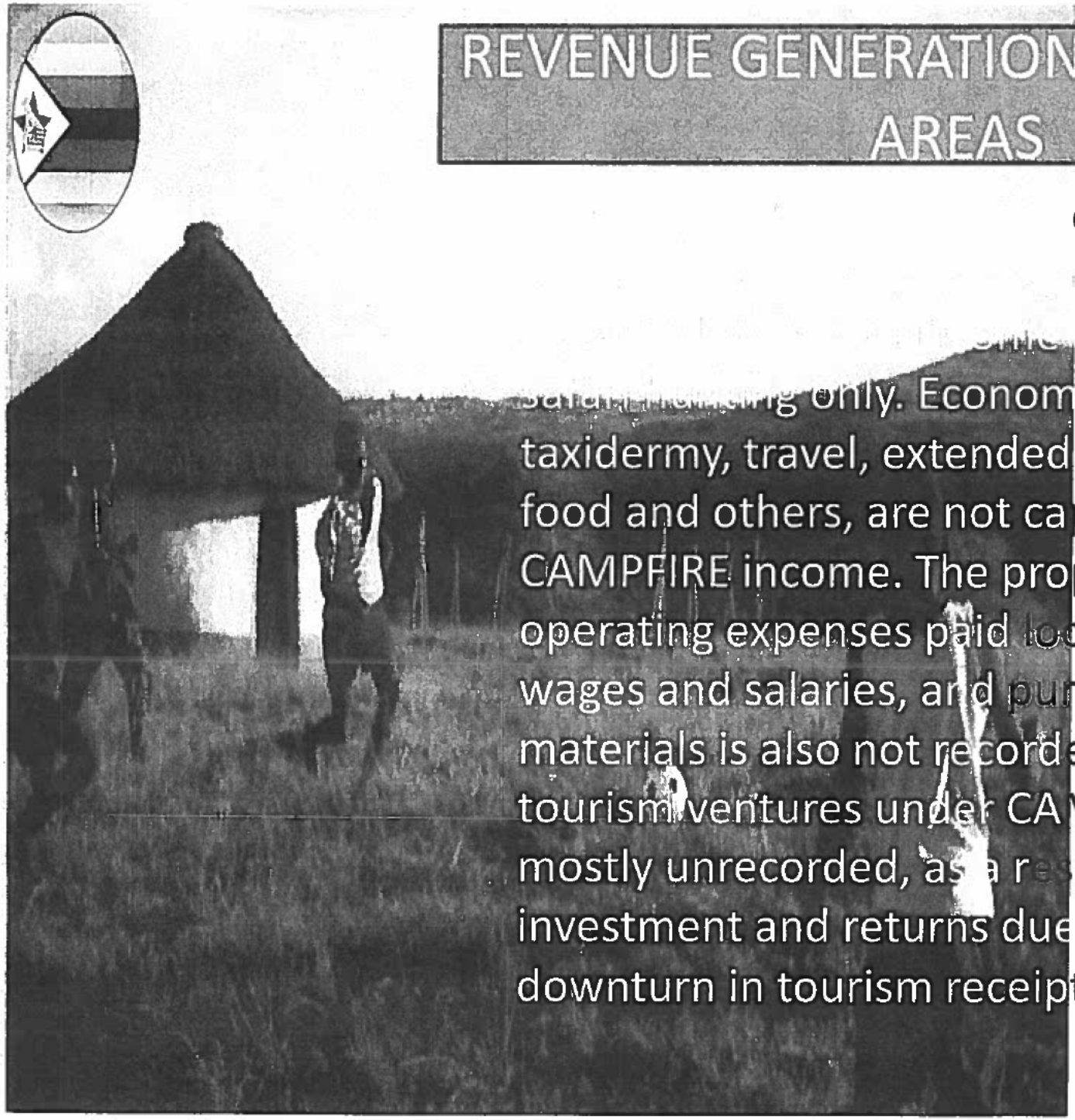
YEAR	GROSS INCOME	COMMUNITY 55%	CAMPFIRE MGT 26%	COUNCIL LEVY 15%	CAMPFIRE ASS 4%
2009	32,500	17,874	8,450	4,875	1,300
2010	41,725	22,948	10,848	6,258	1,669
2011	63,070	34,648	16,398	9,460	2,522
2012	74,408	40,924	19,346	11,161	2,976
2013	65,300	35,915	16,978	9,795	2,612
2014	85,777	47,177	22,302	12,866	3,431
2015	49,350	27,142	12,831	7,402	1,974



REVENUE GENERATION IN CAMPFIRE AREAS

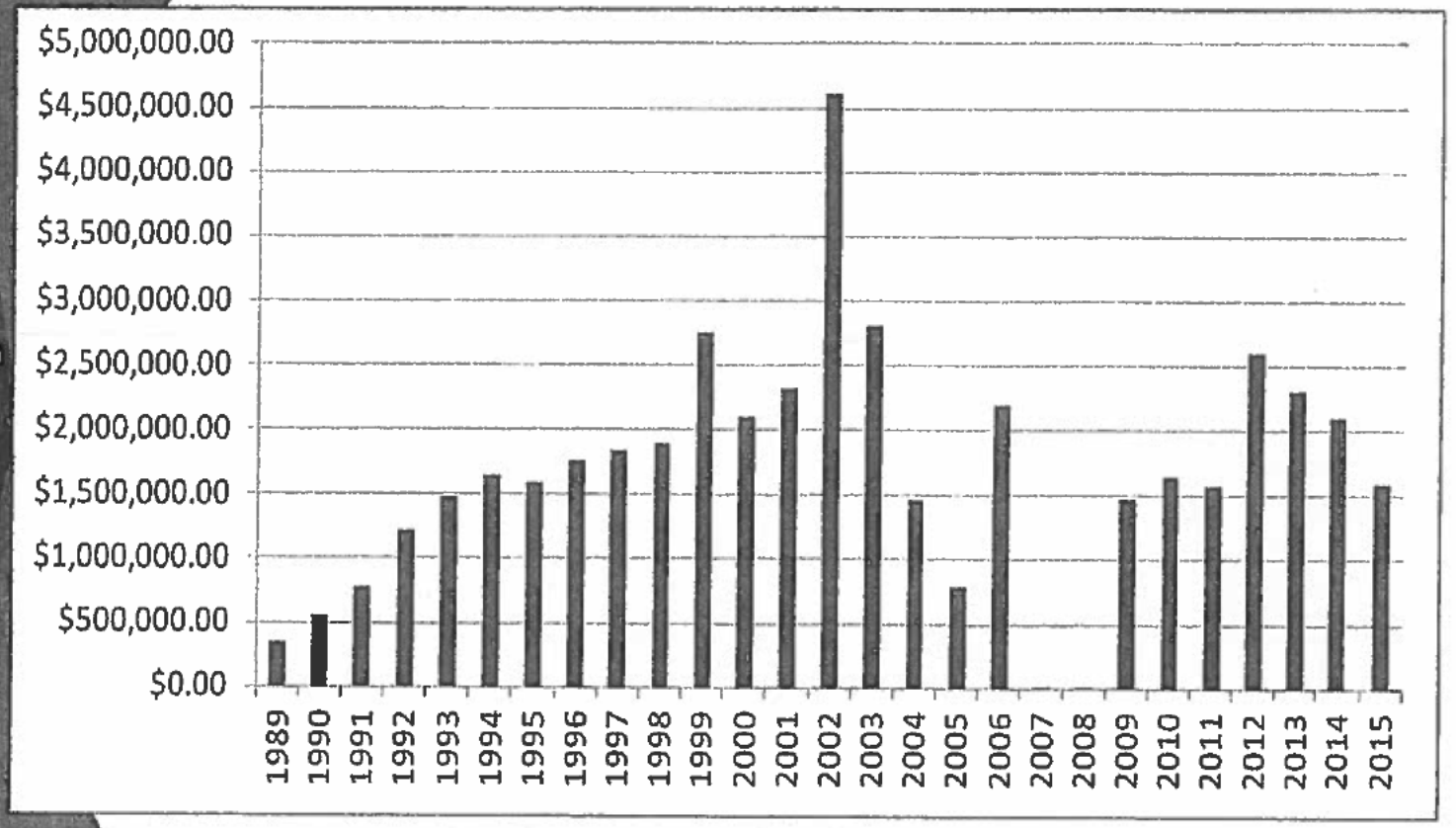
- On average CAMPFIRE generates nearly US$2million per year. This means that communities in major CAMPFIRE areas receive about US$1million every year in total. Since 2007, these communities have been opening their own bank accounts to receive cash from safari operators under a Direct Payment System. This system eliminates previous delays in money reaching the communities and ensures that communities see the value of wildlife.

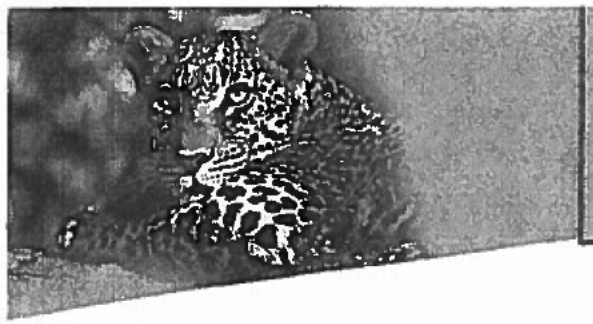
REVENUE GENERATION IN CAMPFIRE AREAS



e, CAMPFIRE
as it is largely
receipts from
g only. Economic multipliers like
taxidermy, travel, extended tourism activities,
food and others, are not captured as part of
CAMPFIRE income. The proportion of safari
operating expenses paid locally in the form of
wages and salaries, and purchase of
materials is also not recorded. Income from
tourism ventures under CAMPFIRE is also
mostly unrecorded, as a result of low
investment and returns due to the current
downturn in tourism receipts for the coun

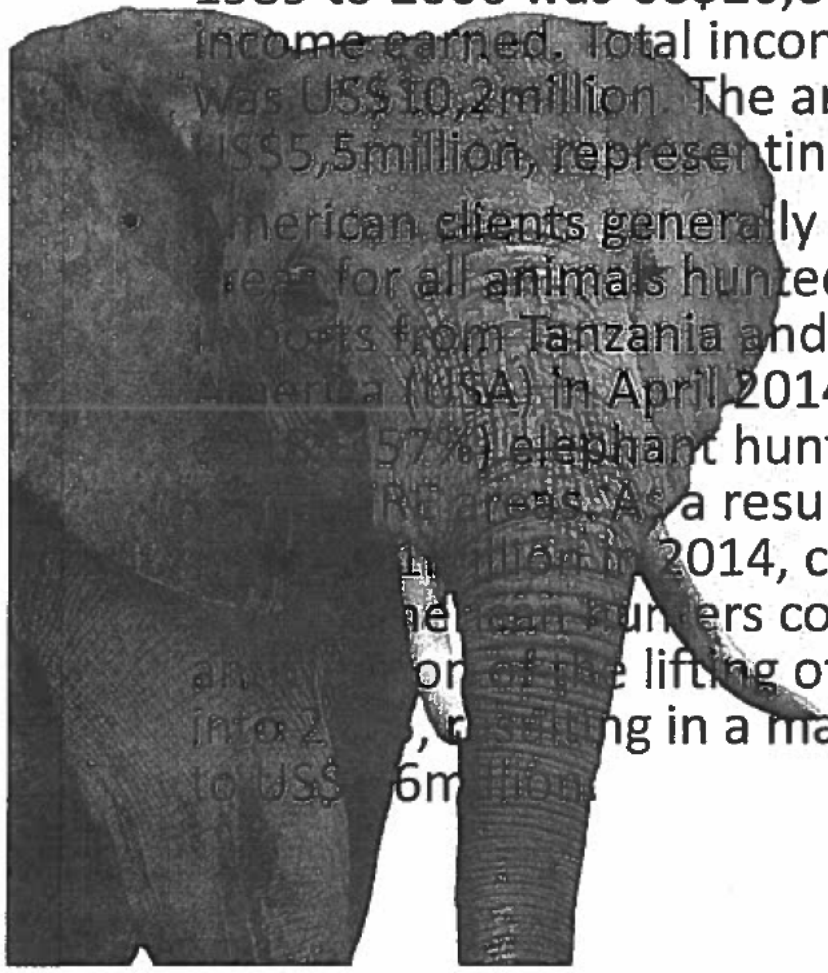
REVENUE GENERATION – CONT'D





MODELS FOR REVENUE DISBURSEMENTS

- The gross amount disbursed to communities as dividends from 1989 to 2006 was US$20,8million, representing 52% of the total income earned. Total income generated between 2009 and 2015 was US$10,2million. The amount disbursed to communities was US$5,5million, representing 54% of total income earned.
- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 190 (57%) elephant hunts initially booked by US citizens in CAMPFIRE areas. As a result of the ban, CAMPFIRE income dropped to US$1,6million in 2014, compared to US$2,3million in 2013, as American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued into 2015, resulting in a massive decline of total CAMPFIRE income to US$0,6million.



Use of Income

- Revenue received by communities (about USD1 million annually) helps directly offset the costs of living with wildlife.
- Most communities have voluntarily invested in infrastructure which has long term benefits such as clinics, schools, and grinding mills.
- However, in some areas, the projects are spread too thinly to meet the needs of a growing number of people.
- Other communities have drilled boreholes, constructed seasonal roads, erecting of fencing to keep out wildlife, purchase of tractors, and direct purchase of drought relief food. Children benefit from reduced walking distances through the construction of schools, procurement of learning materials, and payment of school fees from CAMPFIRE proceeds.
- Communities also benefit from meat in excess of the requirements of safari hunting operations, and from problem animal control.

COMMUNITY PROJECTS FUNDED FROM CAMPFIRE REVENUE

District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
Bilitima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing of fields and rehabilitation of lodge, community truck, tractor, dam repair machinery.
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinics, mothers waiting shelters, teachers' houses, primary schools, community-grinding mills, Police sub-office, piped water and electrification of clinic.
Hurungwe	Construction of classroom block - Nyamakate Secondary, Maintenance of Nyamakate bridge. Purchase of tractor tube, Payment of carpenters, Roofing Chipfuko Primary School and Huyo Secondary School, CAMPFIRE Ward tractor major service, Purchase of Treasurers bicycle, Payment of Nyamakate Clinic guard, 7 resource monitors allowances, 26 bag cement Chitindiva, Kabidza , Manyenyedzi and Mawau cchools for toilets construction, Renovation Karuru School (5 bags cement), and toilet construction, Chitindiva Clinic toilet construction, Roofing Chikova Secondary School, Purchase of buiding materials Chikova Secondary Block, Painting Dete Primary School, Building tollets Makwiye school, Building shed Mupuse school, Roofing Bhashungwe primary school, Sanyati Bridge camp renovation, Purchase of Cement Tashinga Primary School, 6 pairs uniform for resource monitors, Purchase of 20 bags cement Chisipite Primary School, Purchase of tyres for ward tractor, Bridge maintenance
Mbire	Clinics, nurses houses, ward offices, storerooms, 14 classrooms, 7 teachers houses, grinding mills, school offices, wildlife administration offices, 2 hand pump boreholes, water piping, toilet, water storage tanks, 2 tractors, a basic tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	Classroom blocks and furniture (Sihazela, Mlevu, Mtshwayeli, Ntulula, Dibutibu, Gwaai, Nkwizhi, Zibalongwe, Malindi, Mgodimasili, Phelela, Mpilo, Jimila, and Kapane Primary schools), 2 F14 cottages, 10 sewing machines (Dibutibu Secondary school), 7km piped water system for Thembile primary school, Sikente Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

IMPACT OF COMMUNITY BENEFITS ON CONSERVATION

- Every time there is human-elephant conflict, the communities need to see that action is taken by the Authorities, either through compensation for loss and/or damage and through eliminating further potential threats. Any inaction by the Authorities usually results in communities taking matters into their own hands, to the detriment of the wildlife resources therein. However, where communities derive benefit and where there are locally designed and built-in mechanisms for compensation for the whole community through the utilisation of the resources, the communities tend to be more tolerant towards the animals.
- Elephant damage to Community Property includes the following;
- Destruction of crops which affects both the quality and quantity of harvests and impacting negatively on food security;
- Destruction of property;
- Depletion of water sources;
- Destruction of water infrastructure;
- Reduced grazing land;
- Restricted access to essential commodities such as firewood;
- All this results in loss of property and opportunities to carry out other activities due to time spent guarding crops and property.

THANK YOU

MAZVITA!!!

USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.c.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA

OCT 11 2017

Memorandum

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018

After evaluating the available information from the Government of Zimbabwe, other information available to the U.S. Fish and Wildlife Service (Service), and comments received from interested parties, the Service has determined that permits for the importation of sport-hunted trophies of wild lions (*Panthera leo melanochaita*), which are threatened under the Endangered Species Act (ESA), taken in Zimbabwe during the 2016, 2017, and 2018 calendar years **meet** the enhancement criteria under the Service's regulations at 50 CFR 17.32. Therefore, applications received for import of such specimens will be considered to have met this requirement. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized. The Service will reassess the situation in Zimbabwe towards the end of the 2018 season to determine if hunts conducted in 2019 and beyond continue to meet the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the ESA was warranted and proposed a rule under section 4(d) of the ESA to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the ESA) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under section 4(d) of the ESA, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion

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subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the ESA and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the ESA to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, although individual import permits will be evaluated and issued or denied for each application. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, the Service encourages the submission of information from individual applicants. We rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)) , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies.

Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not

perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* are expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding for Lions in Zimbabwe:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC)*

Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the

CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for the present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA's mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation

area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the ESA, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations

also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96% of the all national parks) and safari areas (92% of all safari areas). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lion are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014 used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the

only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on the each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the ESA for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The

quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "(t)he costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implement a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari-hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural

communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests average 2.7% of adult male lions annually. This percentage has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe, were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further,

according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a five-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore,

sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016), only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015).

As agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 and 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters accounted for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport hunters conduct lion hunts in these areas; if so, the Service is not aware if sport hunters are exempted from the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account

fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria based on information available to the Service, we have been able to determine that sport-hunted lion trophies taken in 2016 and 2017 would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in BVC and SVC during 2005-2015. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to local communities, which incentivizes them to conserve the African lion. In the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted;

ZPWMA (2016) reports that the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of SVC from cattle to wildlife (du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. Although U.S. hunter participation in lion hunts is not enough to make or break the industry, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term negative impact.

Further, through the *Strategy and Action Plan,* Zimbabwe has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, and revise our finding as appropriate.

Therefore, based on the information available to the Service. and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit being requested is adequate to justify removing lions from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million

hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserve the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based quota-setting process. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounted for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions with in Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continue to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the current status of lions within Zimbabwe and the level of management and oversight provided to them, the Service is able to find that the harvest and import of sport-hunted trophies of lions within Zimbabwe meet the purposes of the ESA. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe and the Service will reassess lion management within Zimbabwe and whether the importation of sport-hunted trophies enhance the survival of the species at the end of the 2018 hunting season or at which time substantive information becomes available to the Service in the interim.

Although the Service is able to make a finding that the management of lions within Zimbabwe meet the enhancement criteria under the ESA, there are certain documents and data the Service needs to evaluate in order to continue our current finding past the 2018 hunting season. The Service expects to be able to review data from the 2016, 2017, and 2018 hunting seasons to assess the lion populations and ensure that management efforts are enhancing the propagation and survival of the lion within Zimbabwe. Given that Zimbabwe's last management plan for lion was produced in 2006, the Service would like to see an updated plan established. Local management plans, such as the Management Plan for Hwange National Park will be sought. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will seek updates on further progress of the outputs or targets not yet accomplished. Lastly, the Service will also seek an update on the quota setting process. Specially, we will need further information on the establishment and implementation of precautionary quotas.

Therefore, with the information currently available to the Service, the Service is able to make a determination that the import of lions taken in Zimbabwe in 2016, 2017 and 2018 would meet the issuance criteria under 50 CFR 17.32. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application received for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized.

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USFWS PERMIT APPLICATION FORM 3-200-20: ZULIM, THOMAS MICHAEL

Attachment E.5.d.

36A Townsend Road

Suburbs

Bulawayo
Zimbabwe
Tel: +263 9 231329 Fax: +263 9 231329
Email: nengasha@gatorzw.co.uk or kaluga@yoafrica.com

Application To US FWS For Importation Of Trophy Lion From Zimbabwe.

Area of hunt – Deka Tail Safari Area. This is a Zimbabwe National Parks and Wildlife safari area which Nengasha Safaris has a 10 year lease. The area has a 50km boundary with Hwange National Park. At present we have 2 trophy lions on hunting quota.

Income from the lion hunts contributes a major percentage of the total turnover to the safari operation. We have a full time anti poaching team operating throughout the area at considerable expense. We have not only been able to control poaching but without doubt the numbers of wildlife in the area have increased considerably over the past 7 years.

We have also invested in better water supplies , improved roads and fire breaks. In summary the area is well managed with good conservation practices in place.

We also work closely with National Parks at Sinamatella and assist them with fuel and transport to deploy their scouts both in the Park and in the adjoining safari areas.

Simply put without income from lion hunting we would be forced to curtail our anti poac-hing operations and this would be extremely detrimental to wildlife populations in the area. Without control in an area the wildlife can be destroyed quickly – within 2 years it would be decimated.

In summary it is paramount we are able to market and export trophy lion into the USA in the interests of conservation. Wildlife only survives in Africa if it has a value placed on it –

Attachment E. 5. d. 4 pages

we would therefore request you consider this application to import a trophy lion from our area into the USA in a favourable light.
Please find attached our hunting permit for this year reflecting the 2 lion on quota. Once permits are issued for next year we can furnish you with them.
Regards
Paul Bennie.

010 000977

NP/CITES Form 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PCA: .....
PCA 100
Amount paid $250
Rec No. H10R067214
Date 23/01/17

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*].

to ..... Nengasha Safaris .....

of ..... Deka Tail Safari Area .....

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section ..... Deka Tail Safari Area ..... of the ..... Mat North .....

..... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between ..... 01-01-17 .....

and ..... 31-12-17 .....

Animal	A	B	Animal	A	B	Animal	A	B
Baboon	✓	20	Guinea fowl	✓	150	Pigeons/ Doves	✓	150
Buffalo male	✓	6	Girraffe (m)	✓	1	Porcupine	✓	2
Bushbuck m	✓	3	Impala(f)	✓	10	S. Hyena	✓	3
Bushig	✓	2	Impala(m)	✓	10	Sandgrouse	✓	50
Civet	✓	1	Jackal	✓	2	Serval	✓	1
Duiker	✓	3	Klipspringer (m)	✓	3	Waterbuck (m)	✓	1
Elephant (m)	✓	3	Kudu (f)	✓	3	Warthog (m)	✓	4
Francolin	✓	150	Kudu (m)	✓	8	Wildcat	✓	2
Genet	✓	2	Leopard (m)	✓	1	XXXXXXXXXXXXXXXXXXXXXX		
Grysbok(m)	✓	5	Lion (m)	✓	2			

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

P.O. BOX

.....
for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(*Designation* .....)

.....
for Finance Manager

.....
for and on behalf of the Director General, *Parks and Wild Life Management Authority*

(*Designation* ..... A/ DIRECTOR - GENERAL)

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SPORT HUNTING QUOTA FOR 2017

BEKA TAIL SAFARI AREA

Area: 121km2

SPECIES	PREVIOUS QUOTAS									TOTAL QUOTA
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016 2017
Baboon(m)	45	45	45	45	45(fourty five)	45(fourty five)	45(fourty five)	20(twenty)	20(twenty)	20(twenty)
Buffalo(f)	4	4	4	4	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Buffalo(m)	8	8	8	8	8(eight)	8(eight)	8(eight)	6(six)	6(six)	4(six)
Bushbuck(m)	3	3	3	3	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Bushpig	7	7	7	7	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Civet	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Duiker	9	9	9	9	9(nine)	9(nine)	9(nine)	3(three)	3(three)	3(three)
Eland(m)	0	0	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Eland(f)	0	0	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Elephant (m)	5	5	5	5	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Elephant (f)	4	4	4	4	4(four)	3(three)	3(three)	3(three)	3(three)	0(zero)
Francolin	150	150	150	150	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)
Genet	2	2	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Geyzink(m)	5	5	5	5	5(five)	5(five)	5(five)	5(five)	5(five)	5(five)
Guinea fowl	150	150	150	150	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)
Giraffe (m)	0	0	0	0	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)
Impala (f)	20	20	20	20	20(twenty)	20(twenty)	20(twenty)	20(twenty)	10(ten)	10(ten)
Impala (m)	20	20	20	20	20(twenty)	20(twenty)	20(twenty)	20(twenty)	10(ten)	10(ten)
Jackal				6	6(six)	6(six)	6(six)	1(two)	2(two)	3(two)
Klipspringer (m)	3	3	3	3	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)
Kudu (f)	4	4	4	4	4(four)	4(four)	4(four)	3(three)	3(three)	3(three)
Kudu (m)	8	8	8	8	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)
Leopard (m)	5	5	5	5	5(three)	3(three)	3(three)	2(two)	2(two)	1(one)
Lion(m)	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	2(two)
Pigeons/Doves	150	150	150	150	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)	150(hundred & fifty)
Porcupine	2	2	2	2	2(two)	1(two)	1(two)	1(two)	1(two)	1(two)
Hyaena Spotted	10	10	10	10	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	3(three)
Sable(m)	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	0(zero)
Sandgrouse	50	50	50	50	50(fifty)	50(fifty)	50(fifty)	1(one)	50(fifty)	50(fifty)
Serval	1	1	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Waterbuck (m)	0	0	0	0	0(zero)	0(zero)	0(zero)	4(four)	4(four)	4(four)
Warthog(m)	7	7	7	7	7(seven)	7(seven)	7(seven)	2(two)	2(two)	1(two)
Wildest	2	2	2	2	2(two)	2(two)	2(two)	0(zero)	0(zero)	0(zero)
Zebra	5	5	5	5	0(zero)	0(zero)	0(zero)			

ACTING CHIEF ECOLOGIST

ACTING DIRECTOR CONSERVATION

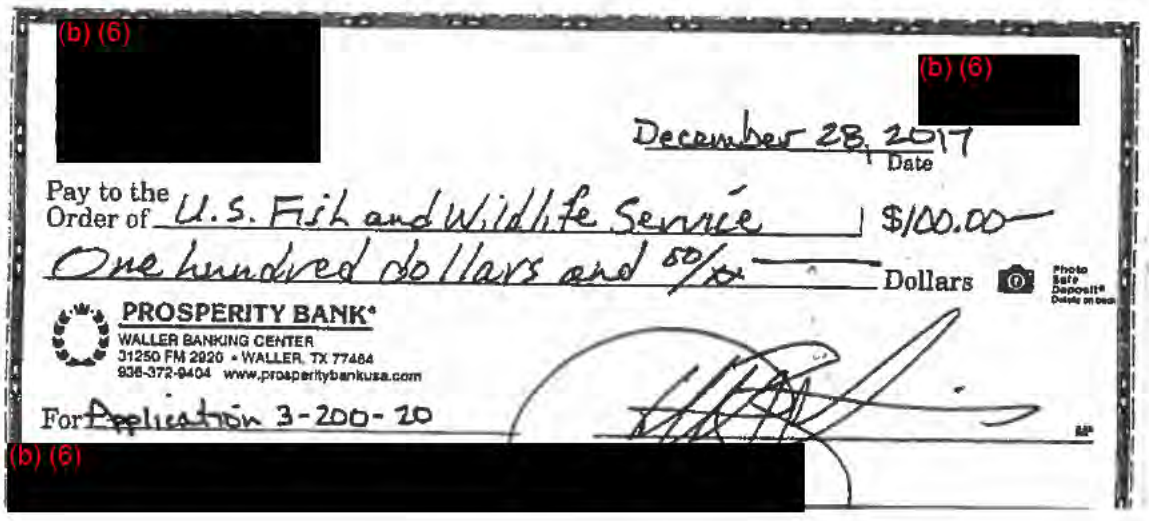
ACTING DIRECTOR GENERAL

BOARD CHAIRMAN

SECRETARY FOR ENVIRONMENT WATER AND CLIMATE

MINISTER OF ENVIRONMENT WATER AND CLIMATE

RCVD FEB 2 2018


(b) (6)

(b) (6)

December 28, 2017
Date

Pay to the Order of U.S. Fish and Wildlife Service $100.00

One hundred dollars and 00/xx Dollars

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For Application 3-200-20

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A FORCE FOR WILDLIFE CONSERVATION

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January 26, 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 FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Bubye Valley Conservancy in Zimbabwe. Bubye Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

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

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 application for a permit to import a threatened-listed lion trophy from Africa.

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 be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion 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: Keith A Riggs

Name: KEITH A. RIGGS

Date: 1/22/2018

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

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

RCVD FEB 05 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Riggs	Keith	A	

(b) (6) [redacted]

5. Affiliation/ Doing business as (see instructions): N/A

(b) (6) [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	1.b. Doing business as (dba)
N/A	

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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Magnolia	Texas	(b) (6) [redacted]		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 767644 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.

Keith A. Riggs — 1/17/2018

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.

      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:

      Bubye Valley Conservancy, Masvingo Province, Zimbabwe

   b. Date wildlife is to be hunted:
      June 11 - 28, 2018

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

      Skull and skin (full life sized skin including 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):

   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:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
Address:	Belmont
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

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, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

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: Keith A. Rapp Date: 1/22/2018

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):
Attorneys at 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.

[redacted] (b) (6)

[redacted] (b) (6)

32-61
1110 1918

DATE January 17, 2018

PAY TO THE ORDER OF U.S. Fish and Wildlife Services $ 100.00

One hundred and 00/100 DOLLARS

CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com

ESA THREATENED LISTED LION

[redacted] (b) (6)

Ruth A. Ross MP

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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January 26, 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 FEB 05 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant hunted in South Africa in November 2017. This lion was hunted in the APNR, which is designated as a "wild" lion population (see attached email). We respectfully request that this permit be approved subject to the FWS' consideration of positive enhancement information already provided by the Department of Environmental Affairs of South Africa.

The second applicant hunted in the Bubye Valley Conservancy in Zimbabwe. Bubye Valley and Conservation Force have submitted extensive documentation about this area. We respectfully request that you consider this information and the non-detriment findings and other information provided by Zimbabwe's Parks and Wildlife Management Authority in making a positive enhancement finding for this application.

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

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

B

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

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

LB

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Stone	Gregory	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)	NA	NA	(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)
N/A	NA

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Reno	NV	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
same as above

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 10US18492A/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.

Gregory L. Stone — 12/20/2017

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 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:

   b. Date wildlife is to be hunted:

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

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):

      Republic of South Africa, Limpopo, Lat: 24;9;23.00999/Long: 30; 51; 23.02000/Farm Excellence/Phalaborwa

   b. Date wildlife was hunted:

      11/25/2017

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

Fullskin, complete skull-teeth, flying bones, 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]:

Lifeform Taxidermy, 7 Aluminum St, ext 8, white river, 124G, Republic of South Africa

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:	Life Form Taxidermy
Business Name:	Life Form Taxidermy
Address:	7 Aluminum St, EXT 8
Address:	
City:	White River
State/Province:	
Country, Postal Code:	Republic of South Africa, 124G

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: Gregory K. Ott Date: 12/20/2017

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):

   same as listed on page 1

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/3240 S. I-10 Service Road W, Suite 200
    Metairie, Lousiana 70001 USA (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.

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: Gregory R Stone

Name: Gregory R Stone

Date: 12/21/17

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No. 30104

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 23 / 11 / 2017 Terminated 28 / 11 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: Ian Brown
Business Address: Farm Excellence
Hoedspruit
Code: 1380
ID No: 7403075022086
PH Permit No: ZA/LP/82739
Date: 28/11/2017 Signature:

CLIENT

Name: Gregory [redacted] Stone
Permanent Postal Address: [redacted]
Reno Nevada Code: [redacted]
Country: USA Tel/Fax: [redacted]
Passport No: [redacted]
Email: [redacted]
Date: 28/11/2017 Signature:

HUNTING OUTFITTER

Name: Wayne Wagner Safaris
Business Address: Farm Excellence
Hoedspruit Code: 1380
I.D. No: 7312125191087
Tel No 015 793 1925 Fax 015 793 2899
HO Permit No: ZA/LP/82287
Date: 28/11/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Excellence Kt 157	Mopani	W.E. Wagner	No. 10536	25/11	Lion	1		X	Full skin, Complete Skull + Teeth, Floating bones, claws

Address to which trophies are to be sent: Life Form Taxidermist, 7 Aluminium St. Ext 2, White River
Code: 1240 Country: RSA Trophy Export Date (Estimate): Unknown

Conservation Levy
Total:

Copies: Client Original White
1st Copy Pink Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter 2nd Copy Blue Retain for a period of three years
Taxidermist 3rd Copy Green Taxidermist
Professional Hunter Last Copy Yellow Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: South Africa Lion permit to US

3 messages

Greg Stone <(b) (6) [redacted] Fri, Jan 19, 2018 at 3:21 PM
To: regina.lennox@conservationforce.org

Hi Regina
Just got this from the outfitter for my lion. Hope it helps with my application. Please let me know if there is more information I can provide. Have a nice weekend!
Greg

-sent from my iPhone

Begin forwarded message:

From: "Wayne & Tao Wagner" <wagnersafaris@yebo.co.za>
Date: January 18, 2018 at 5:41:02 AM PST
To: "'Greg Stone'" (b) (6) [redacted]
Subject: RE: South Africa Lion permit to US

Hi Greg,

Hope that you are well. It is no problem asking for information regarding the lion exportation, we would like to assist you where we can to export the lion trophy to the States.

I have attached a map that indicates the property (Farm Excellence) and the surrounding reserves, i.e. Balule Nature Reserve which are members of the APNR. You will notice that the Farm Excellence KT157 and Excellence's neighbour to the north west – Hoofpyn 269KT – are included on the map although the properties are not formally part of Balule. We have not reached an amicable agreement to join Balule but the properties are separated only by the Olifants River giving the wild lions free roam of the reserves and the two properties as mentioned above.

A part of Excellence is unfenced with Balule Nature Reserve (APNR) and the remaining portion of Excellence & Hoofpyn are fenced but the wild lions roam freely over all these properties. There is a blacktop road to the west of Excellence and Hoofpyn that basically forms the borders of the APNR. The same wild lions that roam Balule Nature Reserve and the APNR roam on Excellence and Hoofpyn.

I again confirm that the lion permit applied for on the Farm Excellence & Hoofpyn was a exportable lion and not a DCA permit.

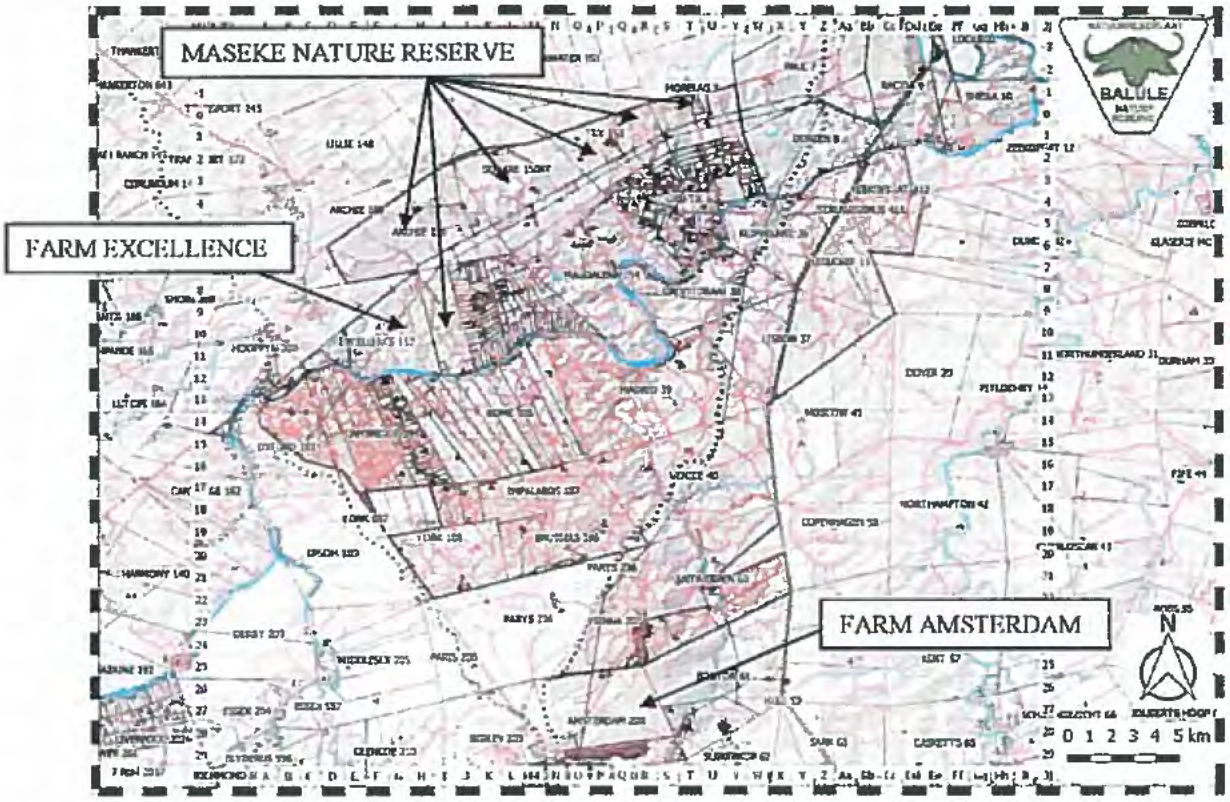
I hope that this is helpful, please let me know if there is anything else we can assist you with.

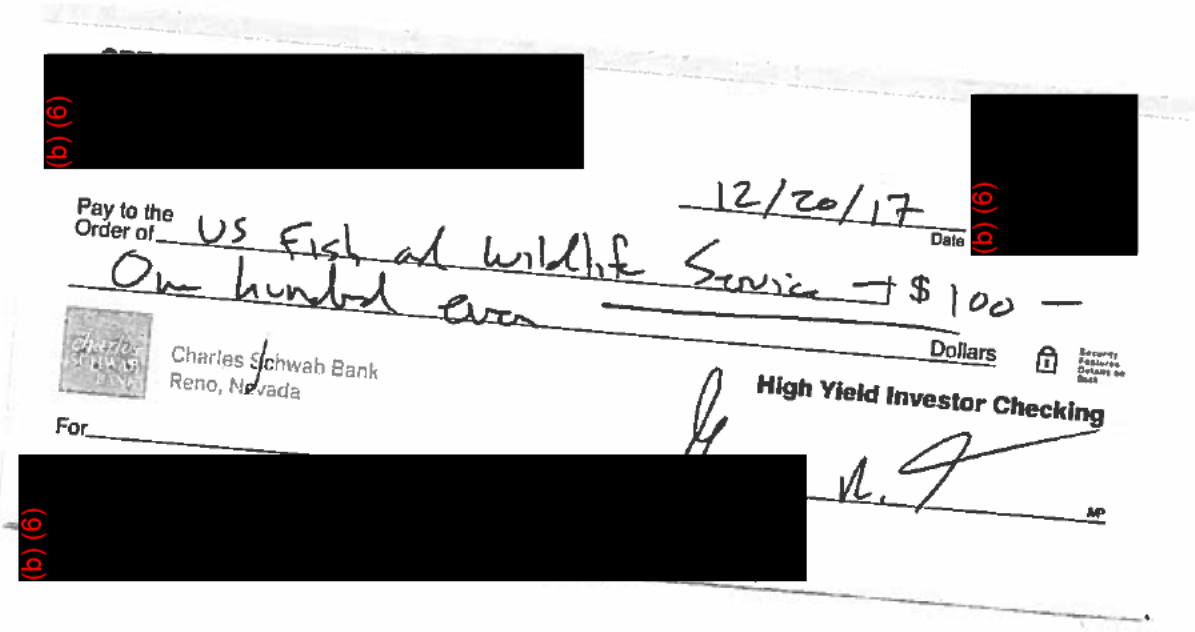
Kind Regards
Wayne Wagner

This email has been checked for viruses by AVG antivirus software.
www.avg.com

GREG STONE LION EXPORT MAP.pdf
414K

APPENDIX A: NEW AREAS INCLUDED INTO BALULE NATURE RESERVE THAT REQUIRE VELD CONDITION ASSESMENT AND SURVEY AS PER APNR ROUTINE.




(b) (6)
(b) (6)
Pay to the Order of US Fish at Wildlife Service
12/20/17
Date
One hundred even
$ 100 —
Dollars
Charles Schwab Bank
Reno, Nevada
High Yield Investor Checking
For
(b) (6)
MP

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
(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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ahern	James	(b) (6) [redacted]	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [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	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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Alpine	TX	(b) (6) [redacted]		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Alpine	TX	(b) (6) [redacted]		USA

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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] 2/1/18

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.

      Lion, Panthera Leo

   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, Matetsi 4, Controlled by National Parks, Victoria Falls, Zim

   b. Date wildlife is to be hunted:

      July 21st – Aug 10th 2018

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

      life size 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: Richard Cooke
Business Name: Richard Cooke Safaris (25 years in business)
Address: representing: Power Zimbabwe (PVT) LTD (holder of operator license)
Address: 653 reynard road
City: Victoria Falls
State/Province:
Country, Postal Code: Zimbabwe

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: 2/1/18

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):

James L. Ahern, (b) (6) [redacted]

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(e)) 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.

James L. Ahern, (b)(6)

Dear Tim,

It was great to meet you @ the show this year. Thank you for fielding all the questions from Richard and I. We are both very interested in anything that has to do with the outdoors. Please let this letter serve as additional information for #5 in the Federal Wildlife Permit Application included in this envelope. As you know the area I am applying for (Matetsi) was invoked in a 5 yr. moratorium on Lion hunting while a study was conducted. The findings of this study by "Wild Cru" was that Lion populations in Zimbabwe and more specifically in the Matetsi areas along with Wange National Park and the surrounding Forestry areas is on the increase. Further, a finding of the study was that the 5 yr moratorium was not needed and that now they may have more Lions than the area can actually support without harming the other wildlife. I personally hunted in Matetsi 5 in 2017 and saw 2 males, 7 female, 3 cubs in only 3 days of being there. The man that runs Swarovski Optik USA told Richard and I that he filmed 50-80 Lions in a 10 day hunt that occurred in Matetsi 3 in 2017. The Matetsi areas 1-7 are considered to be the highest concentration Lion Population in Zimbabwe. The National Park team monitors the age on any Lion taken in the area and will reduce an areas quota if a Lion is taken under 5 yrs old. The area I am applying for has 1 Lion on quota for 2018 (Matetsi 4). Part of the $25,000 trophy fee I will pay goes to National Parks to improve the habitat

James L. Ahern, (b)(6)

for Lion. With the money they will dig bore hole
or water wells to provide more water for the
Lions. They will also build fire breaks with motor
graders to prevent the Lions habitat from bein
destroyed by wildfire that so often occurs in th
area. The final thing they use the money for is anti
poaching efforts which benefit all wildlife in this
great area. These three conservation efforts are considered
to be the most effective ways to help the African Lion.

I personally have helped Lion conservation efforts in Tanz
by buying 2 hunts that included 21 days with a Lion permit
I didnot take a lion on either hunt so if allowed to hunt
this area in Zimbabwe I will have paid considerable mone
to help the African Lion. I have never had a game violation
in either the United States or Africa and have been hunti
since I was 6 years old. I am 42 years old on Feb 15, 201

Richard Cooke has been in business 25 years and his whol
life is fishing, hunting, and conservation of the fish and game
hunts. Richard has a perfect record and has never had a violation
of a game law in either Africa or the United States.

Please consider me for a US Fish and Wildlife Service CI
permit for the great African Lion. My Best,

(b) (6) [redacted]

(b) (6) [redacted]

Date 2/28/18

Pay To The Order Of U.S. Fish & Wildlife Service $ 100.00

One hundred dollars Dollars

Frost National Bank
San Antonio, Texas 78296
www.frostbank.com
#76460C

For Application Fee

(b) (6) [redacted]

RCVD MAR 7 2018

Ahern

(b) (6) [redacted]

Alpine TX

(b) (6) [redacted]

NORTH HOUSTON TX 773

02 MAR 2018 PM 5 L

U.S. Fish & Wildlife Service
ATTN: Ms. Anna Barry
5275 Leesburg Pike
Falls Church, VA
22041-3803

22041-380375

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D
† JAMES G. TEER, PH.D
† BART O'GARA, PH.D.
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January 31, 2018

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

FEB 9 2018

Re: Applications for Import of Sport-Hunted Lion Trophies

Dear Chief Van Norman:

Enclosed please find two applications to import sport-hunted lion trophies. One applicant will hunt in Namibia in July 2018. Namibia has a growing lion population, and some of the communal conservancies have accepted lion to increase available habitat and reduce human-lion conflict. This applicant is hunting in a communal conservancy supporting over 1,000 people.[1] We respectfully request that you consider the enclosed information on Namibia's conservancies and the information available on the NACSO website, www.nacso.org.na, as well as information received from the Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant is hunting in the Deka Safari Area in Zimbabwe in 2019. Deka is a state Safari Area, and his trophy fees and other fees will go to benefit lion management by funding the Zimbabwe Parks and Wildlife Management Authority. We respectfully request that you consider the information and the non-detriment findings provided by the Parks and Wildlife Management Authority and Conservation Force in making a positive enhancement finding for this applicant.

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

Sincerely,

Regina Lennox

[1] http://www.nacso.org.na/conservancies/balyerwa-conservancy

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

FEB 9 2018

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 lion trophy from Africa.

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 be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion 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: Jonathan Ulrich

Date: 01/23/2018

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
(Appendix I of CITES and/or ESA)

FEB 9 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ulrich	Jonathan	E	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		(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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	(b) (6)		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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ 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): 1/29/18

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, Lion
      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:

      Namibia, Caprivi Strip, Balyerwa Conservancy, Katima Mulilo

   b. Date wildlife is to be hunted:

      Estimated July 19, 2018

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

      Life Size 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:	PH Jan Malonie or Gunter Schwalm
Business Name:	Balyerwa Conservancy
Address:	
Address:	
City:	Katima Malilo, Namibia
State/Province:	
Country, Postal Code:	9000

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: 1/29/18

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):

Jonathan Ulrich
(b) (6)
Cleburne, TX (b) (6)

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):
Attorneys at 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.

Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lossen Street
PO Box 98353
Windhoek
Namibia

Tel: +264 61 230888
Fax: +264 61 237036
nacso@iway.na

Balyerwa Conservancy

Region: Zambezi
Population: 1 091
Area km2: 223
Date registered: October, 2006
Address: PO Box 629, Ngweze
Telephone: 081-3630908
Geographical features: A mosaic of woodland and grassland. The average annual rainfall is 600 mm

Unusual or important features:
Kwando River, Mamili National Park on southern border and Mudumu National Park on northern border.

Major wildlife resources:
Elephant, hippo, kudu, buffalo, leopard, bush pig, duiker, warthog, black-backed jackal, lion, spotted hyaena, crocodile, plains zebra, interesting bird life, tiger fish, catfish, various tilapia fish species.

Management:
Management Committee of eight men and one woman; wildlife monitoring using annual count on foot and Event Book monitoring system.

Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

North West game count

NACSO full members

IRDNC

LAC

NDT

CCF

MRCC-UNAM

» See all NACSO members

NACSO partners

Funding partners

Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...

Website by JARO Consultancy

Copyright © NACSO 2018.

the state of community conservation in Namibia

A summary of the annual report

2016

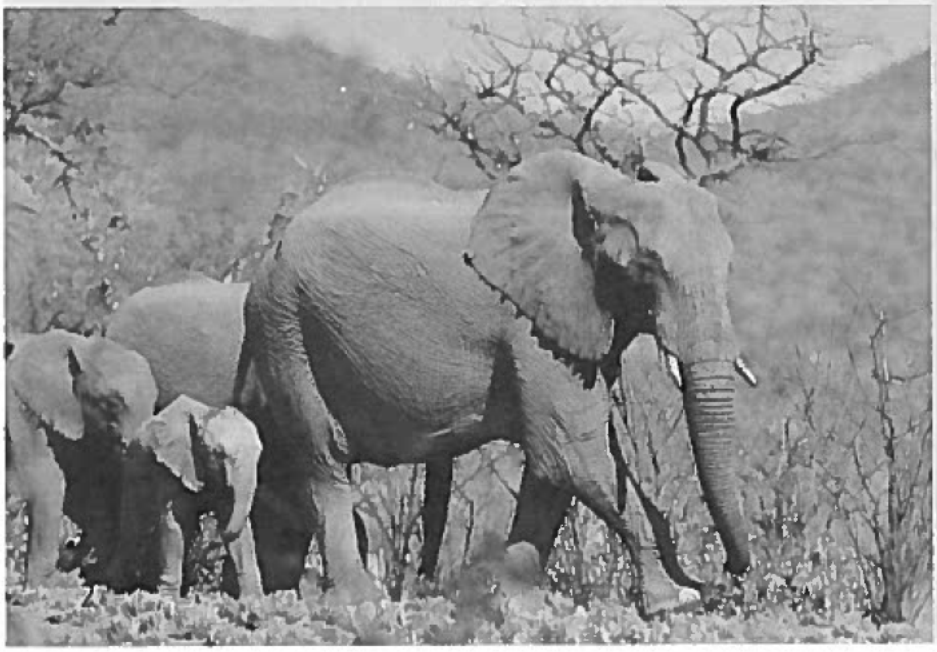
The full report may be downloaded at www.nacso.org.na and is available at the NACSO office in Windhoek

Living with wildlife

Community Conservation in Namibia

... means striving for balanced land use and a healthy environment. Wildlife — and all natural resources — can be utilized sustainably and integrated with other rural livelihood activities for the benefit of the people and the land...

Community conservation is about managing natural resources sustainably to generate returns for rural people. Conservancies, community forests and other community conservation initiatives create the necessary legal framework for this. By choosing to live with wildlife, rural communities are broadening their livelihood options as well as enabling a healthier environment. Through wise and sustainable management and use, natural resources are conserved for future generations while providing significant returns today.



Community conservation in Namibia

At the end of 2016 there were...

- 82 registered communal conservancies
- 1 community conservation association in a national park (Kyaramacan Association – managed like a conservancy)
- 19 concessions in national parks or on other state land held by 23 conservancies (some conservancies share concessions)
- 32 registered community forests
- and 2 community fish reserves

in Namibia

What's being achieved?

Community conservation...

- covers 165,182 km², which is about 52.9% of all communal land with an estimated 195,258 residents (another approximately 5,752 members of the Kyaramacan Association live in Bwabwata National Park)
- of this area, conservancies manage 162,030 km², which is 19.66% of Namibia
- community forests cover 30,828 km², 89.9% of which overlaps with conservancies
- community rangeland management areas cover 4,004 km², much of which overlaps with conservancies
- from the beginning of 1990 to the end of 2016, community conservation contributed about N$ 5.98 billion to Namibia's net national income
- during 2016, community conservation generated over N$ 111 million in returns for local communities
- community conservation facilitated 5,147 jobs in 2016
- 57 conservancies had a total of 164 enterprises based on natural resources
- community conservation supports wildlife recoveries and environmental restoration
- Namibia's elephant population grew from around 7,500 to around 22,800 between 1995 and 2016
- Namibia has an expanding free-roaming lion population outside national parks

The biggest challenges?

- countering the increasing threat from commercial poaching and trafficking of rhino and elephant parts
- countering international pressure to ban Namibia's legal consumptive use of wildlife
- increased local poaching due to drought
- countering growing financial mismanagement
- a levy imposed by the Ministry of Lands and Resettlement, which could render joint-venture lodges financially unviable
- award of prospecting and mining licenses without due consideration to biodiversity and social issues

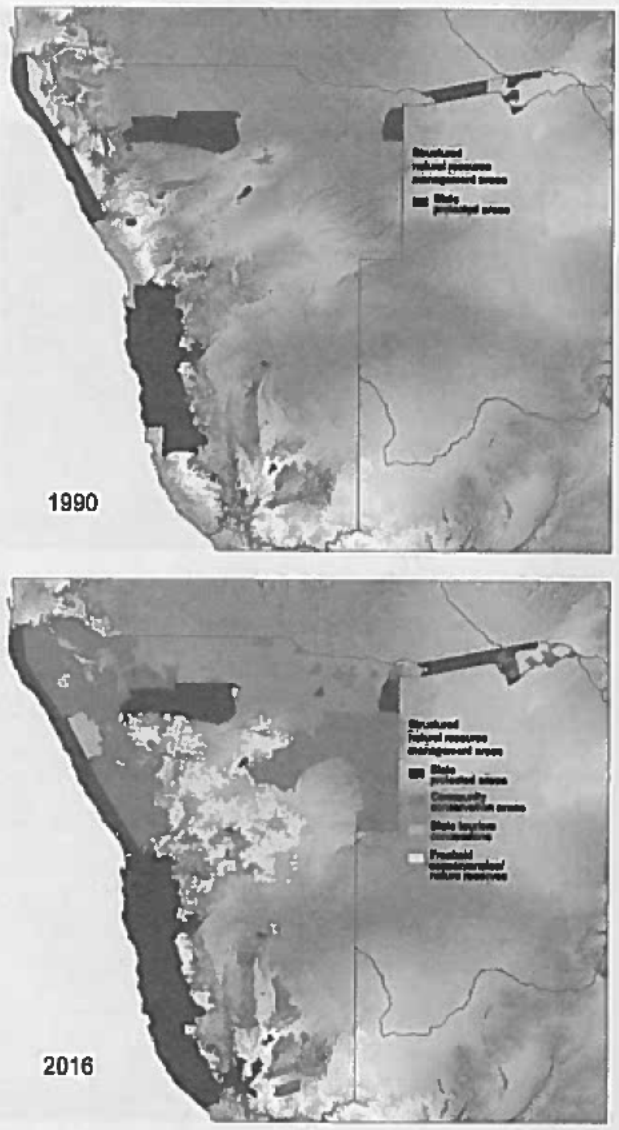
CBNRM

Community Based Natural Resource Management

The earliest community-based conservation initiatives in Namibia, which have today developed into a national CBNRM programme, started before independence when the first community game guards were appointed by local headmen in an attempt to reverse wildlife declines. At the time, wild animals were seen as little more than a threat to crops, livestock and infrastructure, and to community safety. Furthermore, people living in communal areas had been denied their traditional rights to utilize wildlife.

Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to natural resource use. By forming legally-recognized community conservation organizations such as conservancies and community forests, people in communal areas can now actively manage natural resources and generate returns from them. This continues to encourage wildlife recoveries and environmental restoration.

The first conservancies were registered in 1998 and the first community forests in 2006. The Kyaramacan Association was founded in 2006 within Bwabwata National Park and is treated as a conservancy by NACSO. While community conservation organizations are resource management units and businesses, they are also defined by social ties uniting groups of people with the common goal of conservation.



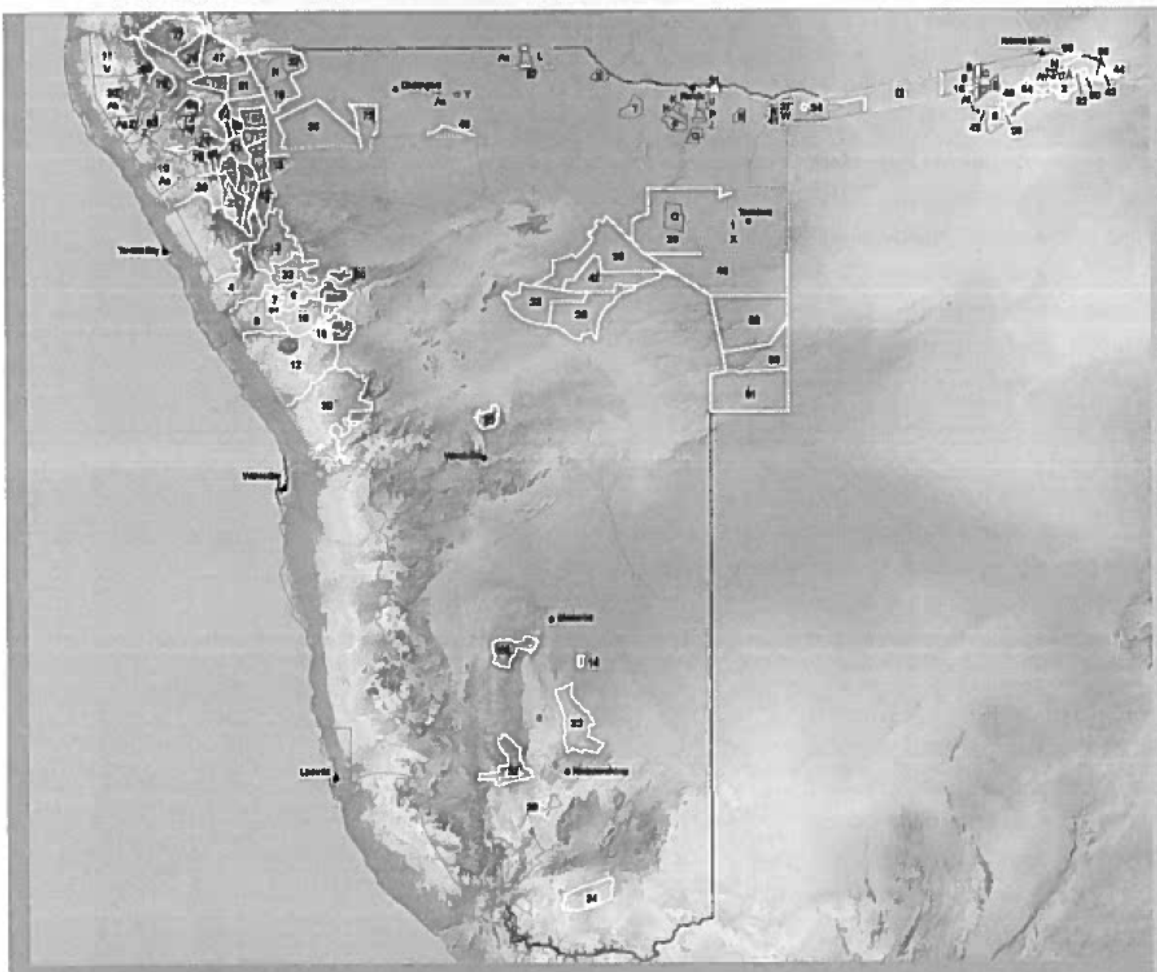
The expansion of structured natural resource management across Namibia

At independence in 1990, there were no registered community conservation areas, freehold conservancies did not exist, and a mere 12% of land was under recognized conservation management. At the end of 2016, land under structured natural resource management covered 43.7% of Namibia.

Front cover photo: Will Burrard-Lucas

The distribution of conservancies and community forests across Namibia

At the end of 2016, there were 82 registered communal conservancies and 32 registered community forests in Namibia and one community association in a national park, covering 165,182 km². [The lists below follow the chronological sequence of registration]



Conservancies

1 Nyae Nyae
2 Salambala
3 ǂKhoadi-//Hôas
4 Torra
5 Wuparo
6-7 Doro Inewas/ Uibasen-Twyfelfontein
8 Kwandu
9 Mayuni
10 Puros
11 Marienfluss
12 Talseb
13 Ehi-Rovipuka
14 Oskop
15 Sorris Sorris
16 Mashi
17 Omatendeka
18 Otjimboyo
19 Uukwaluudhi
20 Orupembe
21 Okangundumba
22 //Huab
23 !Khob Inaub
24 //Gamaseb
25 Anabeb
26 Sesfontein
27 Sanitatas
28 Ozondundu
29 N≠a Jeqna
30 ǂGaingu
31 Joseph Mbambangandu
32 Uukolonkadhi Ruacana
33 Ozonahi
34 Shamungwa
35 Sheya Shuushona
36 !Gawachab
37 Mudúva Nyangana
38 Otjituuo
39 African Wild Dog
40 King Nehale
41 George Mukoya
42 Okamatapati
43 Kasika
44 Impalila
45 Balyerwa
46 Ondjou
47 Kunene River
48 Ohungu
49 Sobbe
50 //Audi
51 Ovitoto
52 !Han /Awab
53 Okondjombo
54 Otjambangu
55 Eiseb
56 Sikunga
57 Okongo
58 Huibes
59 Dzoti
60 Otjitanda
61 Otjombinde
62 Orupupa
63 Omuramba ua Mbinda
64 Bamunu
65 !Khoro Igorab
66 Kabulabula
67 Okongoro
68 Otjombande
69 Ongongo
70 Ombujokanguindi
71 Otuzemba
72 Otjiu-West
73 Iipumbu ya Tshilongo
74 Okatjandja Kozomenje
75 Ombazu
76 Okanguati
77 Epupa
78 Otjikondavirongo
79 Etanga
80 Nakabolelwa
81 Ombombo
82 Lusese

Ci Kyaramacan Association

6-7 Doro Inewas/ Uibasen-Twyfelfontein Joint Management Area

Community Forests

A Bukalo
B Hans Kanyinga
C Kwandu
D Lubuta
E Masida
F Mbeyo
G Mkata
H Ncamagoro
J Ncaute
K Ncumcara
L Okongo
M Sikanjabuka
N Uukolonkadhi
P Cuma
Q Gcwatjinga
R George Mukoya
S Kahenge
T Katope
U Likwaterera
V Marienfluss
W Muduva Nyangana
X Nyae Nyae
Y Ohepi
Z Okondjombo
Aa Omuntu Wekuta
Ab Orupembe
Ac Oshaampula
Ad Otjiu-West
Ae Puros
Af Sachona
Ag Sanitatas
Ah Zilitene

The benefits of community conservation

Community conservation has shown that it can improve rural lives while contributing to biodiversity conservation, and is recognized as a national development strategy. Many conservancies are showing that conservation can generate a broad range of community and individual returns (see graph) while covering their operational costs from their own income.

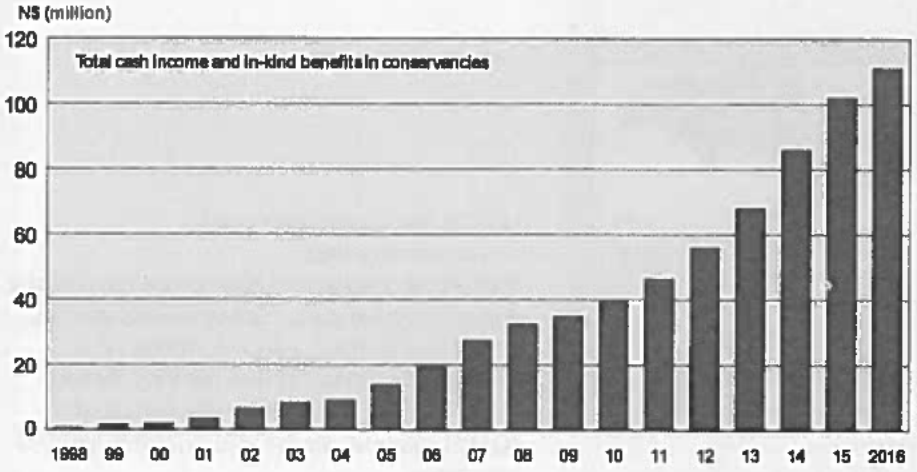
Community conservation can become fully sustainable and largely self-financing in the foreseeable future, provided that appropriate resources continue to be invested to entrench governance foundations, optimize returns, and mitigate threats and barriers to development.

Three pillars of community conservation in Namibia

Institutional development
Good governance creates the basis for resource management and the equitable distribution of returns

Natural resource management
Innovative resource management enables biodiversity conservation and the sustainable use of wildlife and plant resources

Business, enterprises and livelihoods
Incentive-based conservation approaches enable an expanding range of rural livelihood options



Total returns to conservancies and members
The total cash income and in-kind benefits generated in conservancies (including the Kyaramacan Association) grew from less than N$ 1 million in 1998 to more than N$ 111 million in 2016. This includes all directly measurable income and in-kind benefits being generated, and can be divided into cash income to conservancies (mostly through partnerships with private sector operators), cash income to residents from enterprises (mostly through employment and the sale of products), and as in-kind benefits to residents (mostly the distribution of harvested game meat).

Building Foundations

...means creating structures that enable wise and effective governance which empower rural people to control their affairs and resources for a common, sustainable good...

Democratic, effective governance

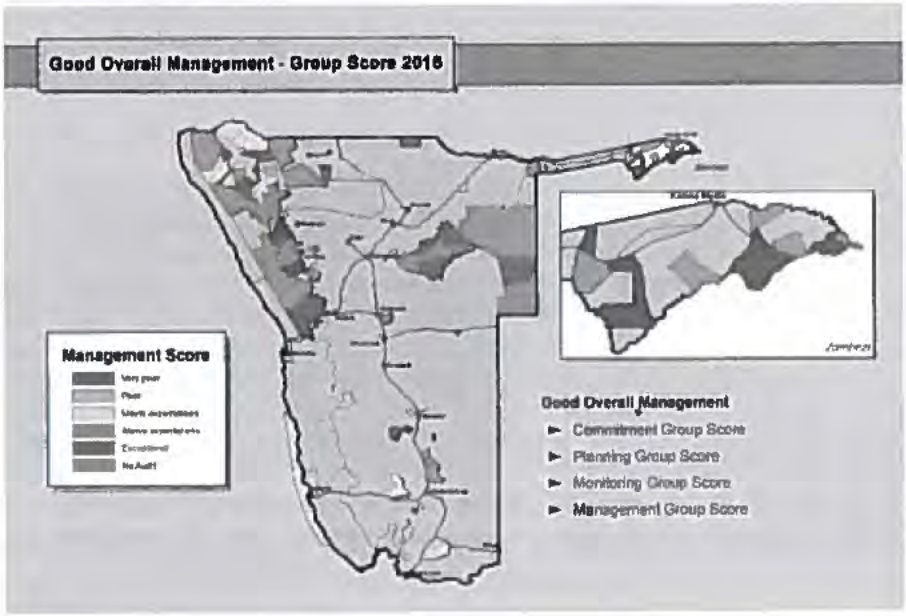
Resources can only be used sustainably if effective management structures exist to guide their use.

Before independence, rural communities were disenfranchised and the absence of a sense of ownership over resources led to their neglect and indiscriminate exploitation.

Conservancies, community forests and other legally recognized community conservation initiatives have created effective formal structures for democratically managing communal resources.

CBNRM, Community Based Natural Resource Management, is the basis of democratic control by local communities over natural resources and the distribution of benefits from them, usually through communal conservancies.

The Conservancy Chairperson's Forum is a national opportunity for conservancies to learn about issues and to exchange views, as well as to raise issue of concerns with senior officials from the Ministry of Environment and Tourism



Natural resource management performance ratings

Institutional development data is collected annually during integrated audits. Conservancies are rated for their commitment, planning, monitoring and management. Conservancies use the information to evaluate and improve their governance, and support organisations are able to provide targeted assistance.

Institutional development can take place without an office – Lusese is a newer conservancy, gazetted in 2014

Institutional development in conservancies in 2015

Order	Category	Status	Number of conservancies reporting	Percentage of category
1	Registered conservancies (incl. Kyaramacan assoc.)	83	83	100
2	Conservancies generating returns	62	83	75
3	covering operational costs from own income	28	46	61
4	distributing cash or in-kind benefits to members, or investing in community projects	38	46	83
5	Conservancy management committee members	950	78	100
6	female management committee members	370	78	39
7	female chairpersons	11	78	14
8	female treasurers/financial managers	32	78	41
9	Conservancy staff members	853	78	100
10	female staff members	245	78	29
11	Conservancies management plans	52	78	67
12	sustainable business and financial plans	15	78	19
13	Conservancy AGMs held	55	78	71
14	financial reports presented at AGM	52	78	67
15	financial reports approved at AGM	43	78	55
16	budgets approved at AGM	35	78	45

Conservancy management capacities fluctuate, influenced by staff and committee changes, as well as the degree of external support. Many conservancies have strong and growing female participation, and a substantial number of conservancies that used to be dependent on grant aid are now covering operational costs from their own income, with many also distributing benefits to members or investing in community projects.

Governance at a glance

At the end of 2016 there were...

- 52 management plans in place
- 15 sustainable business and financial plans in place
- 52 annual financial reports that had been presented
- 55 annual general meetings that had been held
- 15% female chairpersons
- 41% female treasurers/financial managers
- 39% female management committee members
- 29% female staff members

In communal conservancies in Namibia

What's being achieved?

Community conservation means...

- contributing to improved democracy in rural areas
- empowering individuals, including women, to actively participate in decision-making
- employing staff to manage a broad range of resources
- working according to management and benefit distribution plans
- unlocking human potential by providing access to diverse training and capacity building
- enabling controlled tourism development and conservation hunting activities
- covering an increasing portion of operational costs through conservancy generated income
- developing regional conservation structures

2016 saw:

- continued roll-out of Guidelines for the Management of Conservancies and Standard Operating Procedures by the MET
- continued development of adaptive management in conservancies using data collected by conservancies and collated in poster form

The biggest challenges?

- meeting the governance training needs of the large number of conservancies and community forests
- increasing the distribution of equitable financial benefits to members
- ensuring effective cooperation between conservancy committees and staff
- addressing the loss of institutional capacity and memory during conservancy committee changes
- managing competing expectations from stakeholders seeking access to returns from natural resources and other sources, especially farming

Managing Resources

... means ensuring that they are used wisely so that maximum returns are generated while the natural environment remains productive and healthy ...

Powerful management tools

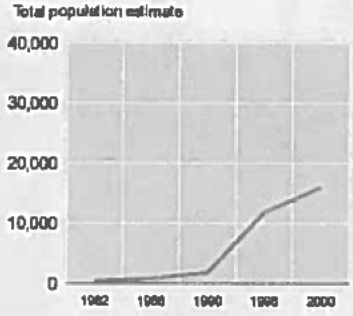
Traditional knowledge and skills are paired with modern technologies and approaches to enable effective management and innovative resource use.

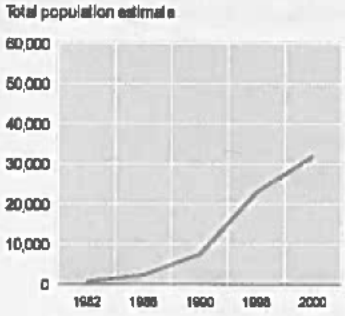
A wealth of information is gathered through a variety of monitoring mechanisms and processed to provide powerful management. As a result, rural communities are empowered to manage their natural resources to generate significant returns while at the same time ensuring the long-term health of the resource base – the natural environment. This encourages environmental restoration and biodiversity conservation.

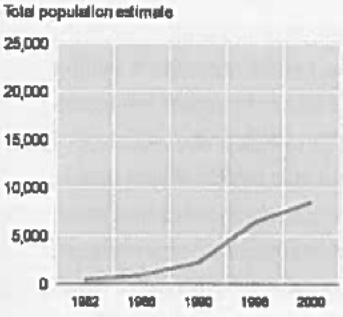
Wildlife populations

Remarkable wildlife recoveries have taken place due to conservancy efforts to minimize poaching and ensure the sustainable use of wildlife. This is most evident in the north-west, where wildlife had been reduced to small numbers through drought and poaching by the early 1980s. It is estimated that there were only 250 elephants and 65 black rhinos in the north-west at this time, and populations of other large mammals had been reduced by 60 to 90% since the early 1970s. Data from species experts shows that the number of rhinos and elephants has increased substantially since then. Aerial surveys (right) indicate that springbok, gemsbok and mountain zebra populations increased over 10 times between 1982 and the year 2000. Data from the annual North-West Game Count indicates fluctuations in the average number of animals seen. The fluctuation of game numbers in north-west Namibia is consistent with 'boom-and-bust' dynamics of arid environments. While strengthened community stewardship through communal conservancies has assisted with impressive population recoveries from the early 1980s through 2011, such good management cannot offset the impacts of four years of prolonged drought. However, the estimated numbers of all species remain at or above those recorded through the aerial surveys at the end of the period of the 1990s and far above the populations of the 1980s.

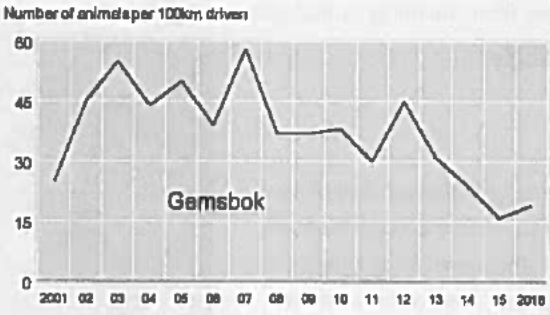
Aerial counts

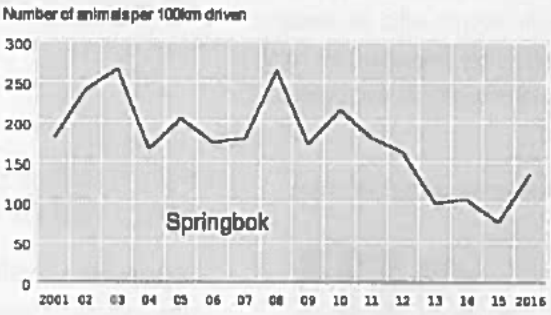






Annual North-West road-based Game Count





Natural resource management at a glance

At the end of 2016 there were...

- 83 conservancies using the Event Book monitoring tool (figures include 3 unregistered, emerging conservancies & the Kyaramacan Association)
- 51 conservancies conducting an annual game count
- 5 national parks undertaking collaborative monitoring with conservancies
- 72 conservancies holding quota setting feedback meetings
- 72 conservancies with own-use harvesting quotas
- 55 conservancies with conservation hunting concessions
- 18 conservancies with shoot & sell harvesting contracts
- 52 conservancies with a wildlife management plan
- 38 conservancies with a zonation plan
- 584 game guards and resource monitors working in conservancies

What's being achieved?

Community conservation means...

- combatting poaching, trafficking of wildlife products and other illegal activities
- mitigating human-wildlife conflict by limiting losses to farmers
- zoning areas for different land uses to reduce conflicts
- enabling wildlife recoveries, effective natural resource management and environmental restoration
- working to promote a large landscape approach to natural resource management
- black rhinos roam freely in communal conservancies
- elephants roam freely across 48 conservancies
- lions occur in 24 conservancies
- species that had become locally extinct in the Zambezi Region, such as eland, giraffe and blue wildebeest, are thriving after re-introductions

2016 saw:

- improvement of wildlife harvesting control mechanisms
- adaptive management strengthened with feedback from
- conservancies
- game guard accreditation scheme rolled out
- induction training for committees continued

The biggest challenges?

- low wildlife harvest quotas because game numbers have not fully recovered
- ensuring that wildlife harvesting is well-controlled and sustainable
- ill-informed criticism of natural resource management
- continued external threats to ban the export of hunting trophies
- building recognition of the vital role of community game guards
- minimizing impacts and optimizing returns from consumptive game use
- promoting incentive-based conservation
- increased commercial poaching and trafficking of wildlife products

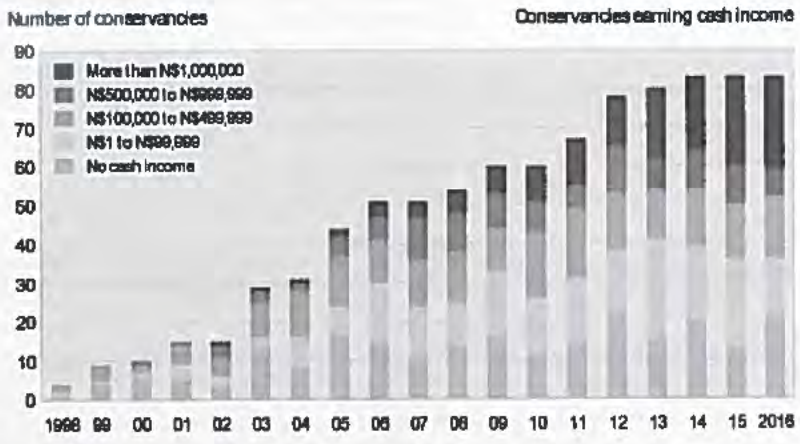
Improving Lives

... means empowering people to diversify incomes from farming to include economic opportunities based on tourism and wildlife ...

New income sources

Returns from wildlife and other natural resources generated through community conservation have proven to be substantial, including direct income to conservancies from tourism and conservation hunting, jobs created, and benefits including the distribution of game meat. New opportunities for rural job creation have arisen, especially in tourism where people are employed in a range of activities.

Diversification of income is a significant contribution to peoples' livelihoods and contributes to community resilience against episodic events such as drought and floods. The ability to cope with such events is increasingly necessary for rural communities confronted with the harsh reality of a climate changing to even greater levels of aridity.

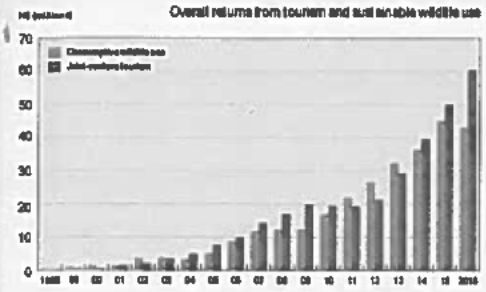


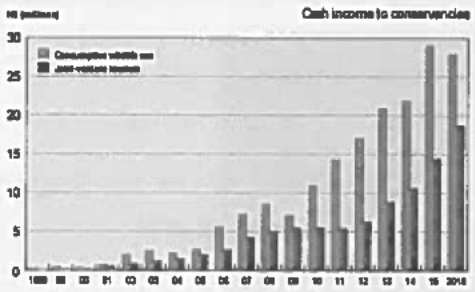
The earning power of conservancies
The graph shows the number of conservancies earning cash, divided into incremental categories (including the Kyaramacan Association). There are great differences in the potential of conservancies to generate cash income. It is noteworthy that the number of conservancies generating a high income, (dark blue, top) is increasing.

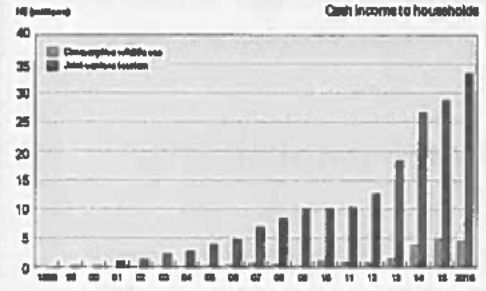
Anna Maria Kopper, !Khob !Naub Conservancy

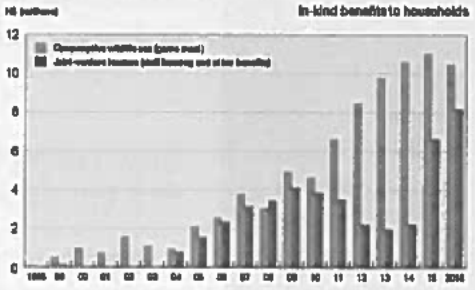
The earning power of conservancies

Significant differences exist between conservancies. There are vast differences in size (the biggest conservancies are more than 200 times as large as the smallest), as well as in the number of residents (ranging from several hundred to more than 30,000). Topography, rainfall and natural habitat influence the quantity and quality of natural resources available in a given area. The skills and experience of conservancy management also affect earning power. Joint-venture tourism and conservation hunting make the greatest financial contributions to conservation, e.g. game guard salaries, and to livelihoods. Meat from hunting is an important in-kind benefit to conservancy members









The complementary roles of sustainable consumptive wildlife use and joint-venture tourism

While overall returns from the two sectors are similar, consumptive wildlife enterprises, specifically conservation hunting, generates much higher fees to conservancies, which can be used to cover operational costs and development projects. In respect to in-kind benefits to households, conservation hunting remains the main contributor in the form of game meat.

Salambala Conservancy Treasurer Judy Mwinga

CBNRM returns at a glance

At the end of 2016 there were...

- 53 joint-venture tourism enterprises with 954 full time and 72 part time employees
- 38 conservancies directly involved in tourism activities
- 55 conservation hunting concessions with 136 full time and 178 part time employees
- 28 small/medium enterprises with 122 full time and 27 part time employees
- 853 conservancy employees
- 950 conservancy representatives receiving allowances
- 1,284 indigenous plant product harvesters
- 570 craft producers

In communal conservancies in Namibia

What's being achieved?

by community conservation...

- Conservancies and private sector partners generated N$ 111,232,053 in returns and benefits during 2016
- of this, tourism generated N$ 64,635,710; consumptive wildlife use (which includes hunting and live game sales) N$ 32,522,368; indigenous natural products N$ 1,620,138; and miscellaneous income (including items such as interest) N$ 1,984,880
- From consumptive wildlife use, meat to the value of N$ 10,466,960 was distributed to conservancy residents
- Conservancy residents earned a total cash income of N$ 52,492,271 from enterprise wages, of which N$ 32,173,686 was from joint venture tourism, N$ 14,744,081 from conservancies, N$ 3,596,691 from conservation hunting and N$ 1,977,813 from SMEs
- Conservancy residents earned cash income of N$1,400,638 from indigenous plants and N$1,465,841 from crafts
- N$ 11,252,045 was distributed to conservancy residents either in cash or used to support community projects

2016 saw:

- Piloting the Wildlife Credits and Incentives Scheme continued, designed to link the conservation performance of conservancies with investors willing to pay for independently verified conservation performance achievement. Revenue will be reinvested directly into human wildlife mitigation efforts and other conservation activities by conservancies

The biggest challenges?

- Improving the financial management of conservancies
- Increasing the ability of conservancies to manage their contractual responsibilities towards the private sector
- Involving the private sector, which benefits from conservancy conservation, e.g. mobile tourism operators
- removing barriers to private sector investment in communal areas, as there are considerable risk of investing in communal lands
- developing revenue streams in areas with low tourism potential or few natural resources

Working for a common vision...

... means focussing on what can be achieved, rather than yielding to difficulties; looking beyond individual activities and local impacts to regional, national and trans-boundary connections, influences and achievements, while facing challenges, anticipating change and striving for sustainability...

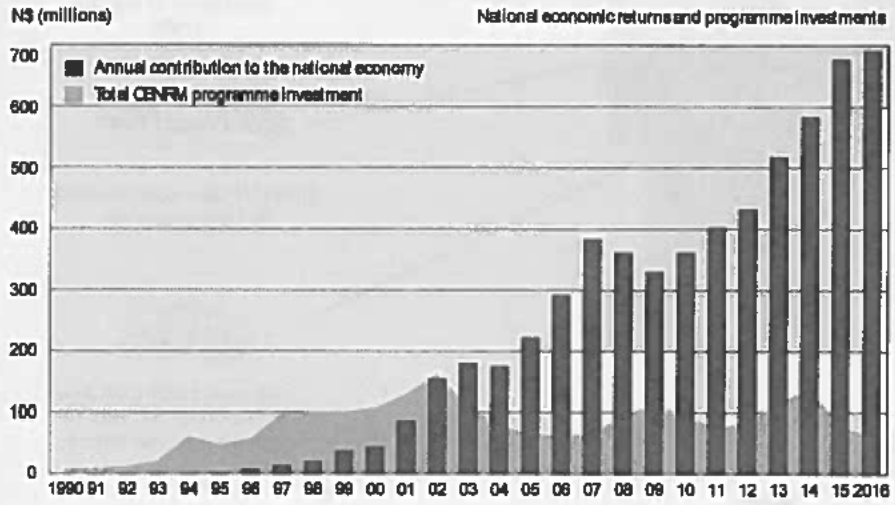
The Namibian conservancy movement has become an internationally acclaimed CBNRM success model. Community conservation is making significant biodiversity contributions and creating synergies with state protected areas. It is strengthening rural economies and contributing to rural development. A large number of conservancies are already fully self-financing. Other community conservation initiatives are well established and operating effectively. A sound foundation is being created, but more needs to be done to consolidate gains and attain sustainability. The CBNRM programme needs to integrate policies and activities fully, ensure adequate technical support and long term maintenance, continue to expand and diversify natural resource potential, and to remove barriers and counter threats that may arise.

How conservation contributes to the economy

Economic contributions from CBNRM may be termed contributions to net national income (NNI). The NNI contributions can be defined as the value of goods and services that community conservation activities make available each year to the nation.

Further economic values could be counted if adequate measures were available, including the economic value of local management institutions and the increased capacity that results from training provided to people associated with conservancies.

The economic merits of programme spending can be seen by comparing the investment in community conservation against returns in terms of NNI, and increasing annual stock asset values in a cost-benefit analysis (Figure right). This can provide an indication of the degree to which the investment made in the CBNRM programme has contributed overall to the national economy and whether this investment has been economically efficient



Estimates of the national economic returns from CBNRM compared to economic investment costs

In 2016, the net national income (NNI) contribution made by CBNRM was about N$ 692 million. Between 1990 and 2016, the cumulative value of the NNI contributions amounts to an estimated N$ 5.98 billion*.

The graph also shows the investment in the CBNRM programme each year, which cumulatively adds up to about N$ 2.1 billion of investment between 1990 and 2016. Donors supplied most of the funds, while the MET and NGOs also provided inputs, mainly as 'in-kind' contributions such as staff, vehicles and other kinds of support.

The future at a glance

Community conservation may ...

- grow to cover 90-100 conservancies and 40-50 community forests
- cover over 21% of Namibia and well over 50% of all communal land
- encompass up to 15% of all communal area residents and well over 50% of rural communal areas residents in suitable areas

What might be achieved?

Community conservation can...

- facilitate significant further growth of tourism in communal areas and increase local involvement
- enhance the reputation of Namibia as well as communal areas offering some of the country's most attractive destinations
- entrench Namibia's position, as offering some of the best conservation hunting on unfenced land in Africa
- mitigate the effects of climate change by reducing dependence on subsistence agriculture
- maximize the potential of indigenous plants through further strategic international partnerships
- strengthen incentives for people to live with and manage wildlife, and protect its habitat, so that future generations can continue to share in this important African heritage

2016 SAW:

- continued roll out of Game Guard Certification Scheme Wildlife Credits pilot programme expanded
- improved compliance with MET Standard Operating Procedures
- start of Wildlife Incentives and Credits Scheme
- progress towards the establishment of the Community Conservation Fund of Namibia

The biggest challenges?

- enabling optimum conservancy governance capacities, effective decision-making and wise leadership, as well as proactive membership
- countering the pressure to ban the legal consumptive use of wildlife
- optimizing land allocation and administration in communal areas
- ensuring long-term technical support to community conservation structures
- achieving self-sufficiency and programmatic sustainability
- creating country-wide awareness of the growing threat posed by commercial poaching and international wildlife crime

The Ministry of Environment and Tourism facilitates the registration of conservancies and is responsible for compliance monitoring. NACSO supports the MET in conservancy governance and assists in the annual game counts

NACSO MEMBERS

IRDNC

NDT

Provides technical support to conservancies including training in natural resources management; community capacity building; institutional and economic development; financial and logistical assistance

Save the Rhino Trust Namibia

Implements rhino conservation and management, and responsible rhino tourism ventures

OMBA

Supports sustainable livelihoods through the development, sales and marketing of quality crafts

Associate member

TOSCO

Links the tourism industry to local people, conservation organizations and research.

NyaeNyae Development Foundation of Namibia

Supports San communities in conservancies

Researches into the social effectiveness of CBNRM and conservancies in Namibia

Cheetah Conservation Fund

Advises communal and commercial farmers on cheetah conservation

Associate member

Works to conserve Namibia's natural environment, to promote appropriate protection, wise use of natural resources and sustainable development

LEGAL ASSISTANCE CENTRE

Provides legal advice to conservancies on constitutions, contracts, legal conflicts, conflict resolution, and advocacy on CBNRM issues

Associate member

Provides technical support nationally to implementers in the fields of natural resource management, business and enterprise development, and institutional development

WWF

Associate members

Three Regional Conservancy Associations - Kavango, Kunene and Otjozondjupa.
These are independent organisations comprised of registered and emerging conservancies in their respective regions acting as representative umbrella bodies

Focus on fishery protection with the Namibia Nature Foundation

Namibia is well-known for its highly productive sea fisheries. But there is much less awareness of the vital role the inland river and floodplain fisheries in the north of Namibia play in food security and livelihoods for much of the country's rural population, including some of the poorest communities in the country.

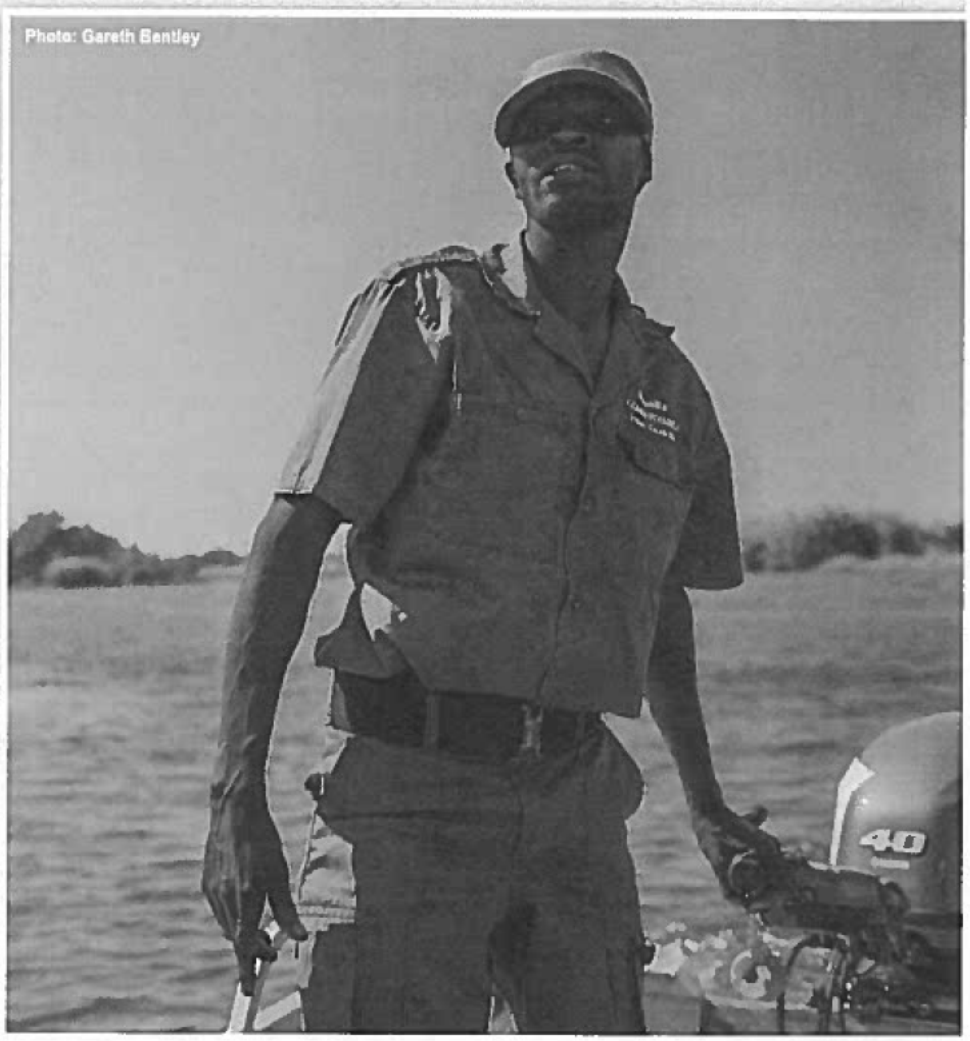
Three major perennial rivers in the north east of the country, the Kavango, Kwando and Zambezi, all support significant fisheries, with additional fishing in Oshanas, the shallow depressions that fill in the north central area during the flood season. However, these freshwater fisheries have in recent years suffered serious declines due to increased, uncontrolled exploitation using environmentally destructive fishing gear.

The NNF has a long-term programme, in partnership with ministries and other organizations, to address the situation. The current NNF EU-funded project, Community Conservation Fisheries in KAZA, aims to encourage and empower local communities to take responsibility for managing fishery resources sustainably.

Throughout the world, Marine Protected Areas (MPAs) are increasingly used to protect fish breeding stocks. This approach is increasingly understood by the Zambezi fishing communities, and the concept of Fish Protection Areas (FPAs) is being adopted by communities.

Two pilot FPAs have been established by Namibian communities, one in Sikunga Conservancy and another in Impalila Conservancy. In a major success last year, at the request of the conservancies and with the Minister of Fisheries and Marine Resources (Hon. Bernard Esau) having taken a direct interest, the FPAs were formally designated as "Fish Reserves" by the Namibia Government. Each of the protected river channels is over 12 km long and together they represent a major commitment to protecting the fish breeding stocks

This is an edited extract from an article by Denis Tweddle, Project Coordinator – NNF/EU Community Conservation Fisheries in KAZA Project



Fish guard on the Zambezi in Sikunga Conservancy

NACSO
Namibian Association of CBNRM Support Organisations

Community conservation

grew out of the recognition that wildlife and other natural resources were of value in communal areas, and that those resources could be unlocked if local communities were empowered to manage and utilize resources themselves.

The Namibian CBNRM programme is based on strong partnerships with the Namibian government, international donor agencies, local and international NGOs, the private sector and community conservation organizations.

www.nacso.org.na

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(b) (6) [redacted]

(b) (6) [redacted]

1/25/18 DATE

PAY TO THE ORDER OF US Fish & Wildlife Service $ 100^00

One hundred dollars and 00/100 DOLLARS

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817.558.2700
pinnbanktx.com

FOR Namibia Lion Project

(b) (6) [redacted]

Detach Check

NOTICE OF REPRESENTATION

FEB 9 2018

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 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: Timothy J. Dayka

Date: 1/24/18

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 (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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DAYKA	TIMOTHY	J	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			(b) (6) [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	1.b. Doing business as (dba)
N/A	

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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
CLOVIS	CA	(b) (6) [redacted]		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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue MA33600C-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): 1/26/2018

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.

      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:

      Zimbabwe, Deka Pool Safari Area, Matabeleland North, DD -18,472852, 26,425552 Hwange

   b. Date wildlife is to be hunted:

      10 JUNE 2019 TO 01 JULY 2019

   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 SIZE 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:	TROPHY CONSULTANTS INTERNATIONAL
Business Name:	TROPHY CONSULTANTS INTERNATIONAL
Address:	4 JOSIAH CHINAMANO RD
Address:	BELMONT
City:	BULAWAYO
State/Province:	MATABELELAND
Country, Postal Code:	ZIMBABWE 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 provided by Conservation Force, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

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: Emily Dolfe Date: 11/24/18

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):
Attorneys at 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.

(b) (6) [redacted]

Date 1/26/18

(b) (6) [redacted]

Pay to the Order of US Fish and Wildlife Service $ 100.00

One Hundred + 00/100 Dollars

BANK OF AMERICA
936 G ST.
REEDLEY, CA 93654

For (b) (6) [redacted]

Meghan Dayka

Antique

CheckWorks, Inc. 1 (800) 871-4223

TAJIKISTAN ARGALI-THREATENED SPECIES IMPORT

Permit Number: MA33600C-0

Effective: 08/02/2017 Expires: 08/01/2018

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:

TIMOTHY J. DAYKA
(b) (6)
CLOVIS, CA(b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1533(d); 50 CFR 17.32.

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

Reporting requirements: Not applicable

Conditions and Authorizations:

A. Authorized to import, for personal non-commercial use, the sport-hunted trophy of one male Marco polo argali (*Ovis ammon polii*) taken during the 2017 / 2018 (September 1, 2017 to March 1, 2018) hunting season from the Murgab region of the Republic of Tajikistan.

B. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tajikistan for the 2017 / 2018 season.

C. Trophy must be accompanied by a valid Convention of International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Tajikistan.

D. If no trophy is imported, this permit should be returned to the Division of Management Authority on or before the expiration date.

E. 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.

F. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

G. Valid for use by permittee named above.

H. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD FEB 12 2018

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

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hadden	David	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Corpus Christi	TX	(b) (6)		United States

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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.

David Hadden — 1-19-2018

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 Pardus Pardus, African Leopard
   - Loxodonta Africana African Elephant
   b. Sex (if known).
   - Male - African Leopard
   - Male - African Elephant
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:
   N/A
   b. Date wildlife is to be 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
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):

Leopard - Zimbabwe, Matetsi Unit 3 - Nearest City Victoria Falls
Elephant - Zimbabwe, Matetsi Unit 3 - Nearest City Victoria Falls

   b. Date wildlife was hunted:
   6-29-2016 - Elephant
   7-4-2016 - Leopard

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Elephant - Tusks, Skin, Ears, Feet, Tail, Trunk
Leopard - Life size mount

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]:
47 Goud St. Laboria
Polokwane, Limpopo Province, RSouth Africa 0704

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: David Alexander Hadden
Business Name: Safari Taxidermy
Address: 47 Goud Street Laboria
Address:
City: Polokwane
State/Province: Limpopo Province
Country, Postal Code: RSA 0704

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: David Hadden Date: 1-19-2018

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). Houston, TX

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):

N/A

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.

N/A

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

David Hadden, (b) (6) [redacted]

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.

FEB 12 2018

(b) (6)

DAVID (b) HADDEN
(b) (6)
CORPUS CHRISTI, TX (b) (6)

2-1-2018
Date

Pay to the Order of U.S. Fish And Wildlife Service | $ 100 ~~100~~

One Hundred Dollars Dollars

WELLS FARGO Wells Fargo Bank, N.A. Texas wellsfargo.com

For Elephants Leopard Desert

(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
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RENEE SNIDER

January 16, 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 the following:

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Mangomba Safaris. The operator report for Mangomba is enclosed, and demonstrates the company's extensive commitment to anti-poaching, habitat protection, community investment, and responsible and sustainable wildlife management. For example, the company employs 25 anti-poaching scouts. They maintain a written concession plan with anti-poaching and community investment obligations. They contribute over $51,000 to three Community Resource Boards for law enforcement and infrastructure projects, plus another $5,882 to assist local villages in rehabilitating tourist camps for the villages' benefit. The company's ability to sustain these commitments largely depends on lion hunting. Half of the company's revenue comes from lion hunts, and almost all (95%) of their clients are U.S. hunters.

- One application to import a sport-hunted African lion trophy hunted in Zambia in July 2017. This applicant hunted with Baobab Safari Co. The company employs 30 anti-poaching scouts to patrol a large concession of 2,185 km^2. Their anti-poaching efforts have led to a visible increase in lion prey species over the past year, which suggests the local lion population may grow by up to 10%. The company contributes $73,500 to the local Community Resource Board to assist with salaries for community scouts, infrastructure projects, and resource monitoring. Like Mangomba, half of the company's income comes from lion hunts, and almost all clients are American.

- One application to import a sport-hunted African lion trophy to be hunted in Zimbabwe in 2019.

The first two applications should be approved pursuant to the positive enhancement finding authorizing the import of African lion trophies from Zambia effective for the 2016, 2017, and 2018 seasons. However, if these applications need to be approved on a case-by-case basis, please consider the enclosed enhancement reports. With respect to the 2019 application, please consider these reports and the other documents submitted by Conservation Force and Zimbabwean authorities and operators in making a positive enhancement finding for this applicant.

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

Sincerely,

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 one 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:

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: Charles (b) (6) Waibel

Name: Charles (b) (6) Waibel

Date: 12-27-17

RCVD FEB 2 2018

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 (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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
WAIBEL	CHARLES	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
POWELL BUTTE	OR	(b) (6)		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: UN SURE OF # 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 an(b) (6) lse statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) o r permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 12-27-17

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:

   b. Date wildlife is to be 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

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):

      Zambia, Munyamadzi / Nyampala Game Management Area, GIS: S 12 38 59.7; E 032 03 37.9

   b. Date wildlife was hunted:

      July 5th, 2017

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

Full Skin, skull, teeth, claws and floating bones.

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]:

Plot 10549, Lumumba Road, Lusaka, Zambia

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:	Baobab Safaris
Business Name:	Baobab Safaris
Address:	Plot 133
Address:	Freedom Way, PO. Box 34272
City:	Lusaka
State/Province:	Central Province,
Country, Postal Code:	Zambia

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, Zambian authorities, Zambian operators, and others.

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: Charles (b) (6) Wachtel Date: 12-27-17

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.

ENHANCEMENT REPORT

BAOBAB SAFARI COMPANY, LTD.
Plot 133 Freedom Way Road, Box 34272, Lusaka.
huntnyampala@gmail.com
Nyampala Munyamadzi Game Management Area, Zambia

I. DESCRIPTION OF COMPANY AND CONCESSION

Baobab Safari Limited has been operating in Nyampala Munyamadzi Concession since 1993 after a ban for almost three years. The concession is 2185 km² and provides habitat for a range of species including buffalo, lion, leopard, hippo, Waterbuck Common, bushpig, kudu, roan, eland, reedbuck, crocodile, grysbok, impala, bushbuck, hyena, warthog, puku, zebra, hartebeest, Wildebeest Cookson and Elephant (lion and lion prey). Our concession is in Nyampala Munyamadzi Area and it has been categorized as a prime area by our Wildlife Authority. We have a lease with the Wildlife Authority for seven years, renewable.

Our company is family-owned and has been operating in this country for 30 years. We employ four professional hunters, 6 game trackers, 30 anti-poaching scouts, and six camp staff (cooks, waiters, cleaning, miscellaneous). **Altogether our operations support at least 150 dependents in local villages.**

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

II. ANTI-POACHING COMPONENT

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

A. Law Enforcement

Baobab Safari Limited is very much aware that law support enforcement is very cardinal, to enable the officers from the Wildlife Authority on the ground carry out patrols in order to ensure the

hunting block is well protected from poaching activates. To this effect the outfitter has committed to pay the sum of US$61,000.00 to be shared among one Community Resource Board in the area.

B. Fire Management

The outfitter is committed to pay the sum of US$2,750.00 towards the management of fire in the hunting block. The outfitter has further committed to provide transport to assist the department of wildlife and the community to curb fires and management of early burning activities.

C. Scouts Management

We supply rations once per month to the scouts to ensure they are sufficiently equipped for the patrols.

Since operations from late June 2015. During the opening season of 2016, we have physically seen elephants and a lot of movement in and around the camp. Physical presence of the scouts in and around the camp has made a positive response.

From late November 2016 to date:

Item	Spend (USD)	Notes
Scout salaries	3,000.00	Law enforcement, fire control
Scout equipment	-	Infrastructure development,etc
Diesel / petrol	1,500.00	Total contribution: $35,000.00
Rations for WA and community scouts	2,500.00	
Wage for the driver	1,000.00	
Wages for monitoring team	1,000.00	
TOTAL	**US$9,000.00**	

D. Distribution of meat to the Community

The outfitter also distributes edible carcasses to the community as a measure to reduce poaching by the community. A minimum of 50% of hunted meat is distributed to the community and it is shared amongst them through their community resource boards by a liaison officer who is employed by the outfitter.

E. Road Clearance

The outfitter also sends out road crews approximately every two weeks to check the condition of the roads in the concession, as a way of ensuring that the patrol of the area is done effectively.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

Baobab Safari Limited is committed to pay about US$73,500.00 to the Community Resource Boards.

The outfitter has further committed to pay the sum of about US$11,500.00 towards infrastructure development and maintenance.

The Outfitter has also constructed a tented Safari Camp on the Mutinondo River which is also creating employment for the locals and helping in anti-poaching.

Further more the outfitter is committed to pay US$7,500.00 towards the resource monitoring to enable that all the available resources on the ground are well monitored.

IV. OTHER INFORMATION

Prey Base

Baobab Safari Limited's anti-poaching efforts and fire management have allowed the lion prey base in our concession to grow over the past year. We estimate that our Lion and Leopard would increase by 10%.

Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, ABC Safari Company maintains a Google Earth database of lion sightings and tracks. We record sightings, spoor, or footprints and as much data is known on the individual. Because we keep tabs on the lion in our concession, we are assured that the regulated, limited offtake is sustainable.

Lion Aging Approach

Baobab Safari Limited has been following an age-based policy for African lion trophies since 2016, we have adopted a company rule not to harvest lion below six 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. We successfully harvested mature (aged six of older) male lion up to our quota (of two).

Lion Hunting Revenue

Lion and Leopard are our highest-value species. We require 21-day safaris for lion and Leopard require 14 day safaris. Our daily rate is US$1,800.00 per day, plus a trophy fee of $15,000 (lion) and $6,500 (Leopard).

We generate approximately 85% of overall revenue from lion and Leopard hunts, and approximately 50 % of our annual revenue from lion hunts alone.

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

Baobab Safari Limited 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.

All Lion and Leopard hunts are studied and scrutinized on camera to determine their age and size before they are actually shot.

Lions are seen on almost daily basis indicating a healthy growing population. Only 1 Lion is on quota.

Signed: R. Nandus

Operator Name: Baobab Safaris Limited

Title: Director

LEOPARD AND LION HUNT RETURN FORM

(Each animal hunted should be accompanied by a separate data sheet and all measurements should be in metric units)

Name of Professional Hunter: MARK. A. SWANEPOEL | Monitoring Scout: catherine Chiluba | Rank: S. Scout

DETAILS OF CLIENT

Name of client: BRADLEY. C. WAIBEL | Nationality: USA

Country of Residence: USA

Address: USA

GMA permit No: 23871 | Non Resident Hunting Licence No: (23871) → 21889

DETAILS OF HUNT AND TROPHY MEASUREMENTS

Name of GMA:	MUNYAMADZI / NYAMPALA	Hunting period	
Name of Hunting Block:	NYAMPALA	From (Date): 28-06-17	To (Date): 28-07-17

Date Killed or wounded	Species	Killed or Wounded	Sex (Tick)		GPS Location (in decimal degrees - hddd.ddddd°)	
					Latitude	Longitude
05-07-17	LION	KILLED	Female	Male ✓	S12°38 59.7	E032°03 37.9

Date measured (DD/MM/YY)	Total length (Nose to tip of tail - cm)	Tail length (cm)	Shoulder height (Shoulder to base of paw in cm)	Skull length (cm)	Skull width (cm)
08-07-17	275cm	92.5cm	85cm	37.6cm	23cm

PHOTOS & SAMPLES (tick in space provided for photos & samples taken)

1. Whole body from the side*	✓	7. Teeth before cleaning (front & side)*	✓	12. Ridges on back of Lower canines	✓
2. Mane from the top*	✓	8. Teeth after cleaning (front & side)	✓	13. Tissue samples taken	
3. Face & head from the top*	✓	9. Lower Jaw from side	✓	14. Premolar extracted	
4. Face & Chest*	✓	10. Ridges on back of Upper Canines	✓		
5. Nose*	✓	11. Whisker spots (Right & Left)	✓		

*These photos should be taken at kill site before skinning and in as good of light as possible. Teeth and nose should be blood and dirt free to provide clear assessment

DATA RECEIVED BY: **DATE:** **SIGNATURE:**

REPUBLIC OF ZAMBIA

The Zambia wildlife Act
(Act No 12 0f 1998)

LFZAWA Form 2

The Zambia Wildlife (Licences and fees) Regulations, 2007

21389

NON RESIDENT HUNTING LICENCE

(Regulation 3 (2)

Station of issue: Chilanga Date of issue: 22/6/17

DETAILS OF LICENSEE

Full Name: BRADLEY WAIBEL NRC/Passport No: (b) (6) [redacted]

Nationality: U.S.A Tel/Fax:

Addrsss:

Full Name of Safari company: Baobab Saf

Company Cert. Incorporation No: Date of incorporation:

Postal Address: (b) (6) [redacted]

Residential Address:

Firearm Licence/Tourist's Firearm import No: Caibre of Firearm(s):

Type of Hunt: Hunting Block:

Dat 73623241

The above named Safari company and its bona fide Clients are authorised by this licence under the Guidance of a Professional hunter to hunt the follwing Game or Protected animals within the Game Management Area or hunting block Specified hereunder and for the specified period and upon payment of the fees specified below

Species of animal	Number	Sex	Hunting Area	Hunting Period	Fees US$
Lion	1st	M	Nyampada	2017	
			Im sugu		

Total Animals Fees	
Concession Fees	/
Grand TOTAL	

Note:
Original copy to be retained by the Licensee
Duplicate copy to be forwarded to the Director General or to an agent
Triplicate to be retained in the book

REPUBLIC OF ZAMBIA DEPARTMENT OF NATIONAL PARKS AND WILDLIFE 22 JUN 2017 LICENSING PRIVATE BAG 1 CHILANGA, ZAMBIA

Date 22/6/17

Director General

No. 12035

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTIING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name: MARK. A. SWANEPOEL NRC/Passport No: (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return: BAOBAB SAFARIS

DETAILS OF CLIENT

Full Name: BRADLEY. C. WAIBEL NRC/Passport No (b) (6) [redacted]

Postal Address: (b) (6) [redacted]

Non Resident Hunting Licence No: 23871 Date of issue: 22-06-17

Name of Hunting block hunting was conducted MUNYAMADZI / NYAMPALA GMA

Hunting period: 28-06-17 to: 28-07-17

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export Yes	Trophy for Export No	Foreing currency value charged to client
04/07/17	HIPPO/MALE	ONE	–	S12°6635.9 E032°0975.9	✓		#21891
05/07/17	COOKSONS WILDEBEEST/MALE	ONE	–	S12°31101 E032°05477	✓		#18189
08/07/17	LION/MALE	ONE	–	S12°3859.7 E032°0337.9	✓		#21889

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
HIPPO		24"	
C/WILD		26"	
LION		25"	

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amount
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. including overheards & Extras		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DG for animals, Licences and Hunting rights		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged.

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Resident Hunting Licence & that the foreign currency stated above is the full amt. Paid by the client for the hunt.

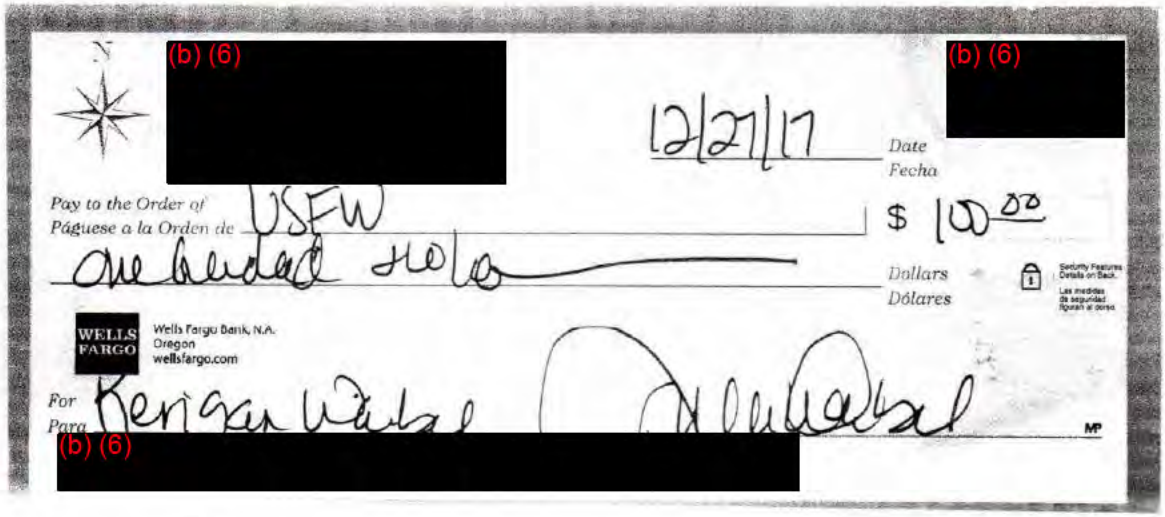
Date: 08-07-17 Signatures: Client

Professional Hunter

Wildlife Police Officer

White copy to the Director General - ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

RCVD FEB 2 2018



United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-75475C

Enhancement Finding
Applicant: Charles (b) (6) Waibel (PRT-75475C)

Charles (b) (6) Waibel submitted an application on February 2, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 5, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Waibel's application involving a *P. l. melanochaita* sport-hunted trophy taken in the Nyampala GMA, Munyamadzi, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Waibel's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Waibel's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Waibel's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Waibel's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Waibel's will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Waibel's, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Waibel.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Charles (b) (6) Waibel.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA75475C-0

Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

CHARLES (b) (6) WAIBEL
(b) (6)
POWELL BUTTE, OR (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia 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).

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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February 21, 2018

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

FEB 26 2018

Re: Applications for Import of Sport-Hunted Lion and Leopard Trophies

Dear Chief Van Norman:

Enclosed please find three applications to import sport-hunted lion trophies and one application to import a sport-hunted leopard trophy. These applicants will hunt in the Savé Valley Conservancy in 2018. This conservancy is well known for their excellent wildlife management, including management of lion and leopard. The conservancy maintains increasing carnivore populations subject to a local management plan, and conservative offtake quotas. Regulated hunting revenues are reinvested in wildlife management and protection, including 30-40 highly trained anti-poaching that protect the conservancy's large black rhino population. We respectfully request that you consider the enclosed information and the information submitted by Zimbabwe's Parks and Wildlife Management Authority and Conservation Force, including the lion hunting report dated January 31, 2016, in making a positive enhancement finding for this applicant.

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

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, 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: JEFFREY J CAMPAGNA

Date: 2/15/18

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

FEB 2 6 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Campagna	Jeffrey	D	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Moline	IL	(b) (6)		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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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.

Jeffrey D Campagna — 2-15-18

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 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:

      Zimbabwe/Save Valley Conservancy/20deg,28'40"S - 32deg,14'55"E/Humani Ranch/Chiredzi (nearest town)

   b. Date wildlife is to be hunted:

      June/July of 2018

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

      Complete skin (including claws), Skull (including 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]:

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:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Rd
Address:	Belmont
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

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: 2/15/18

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):

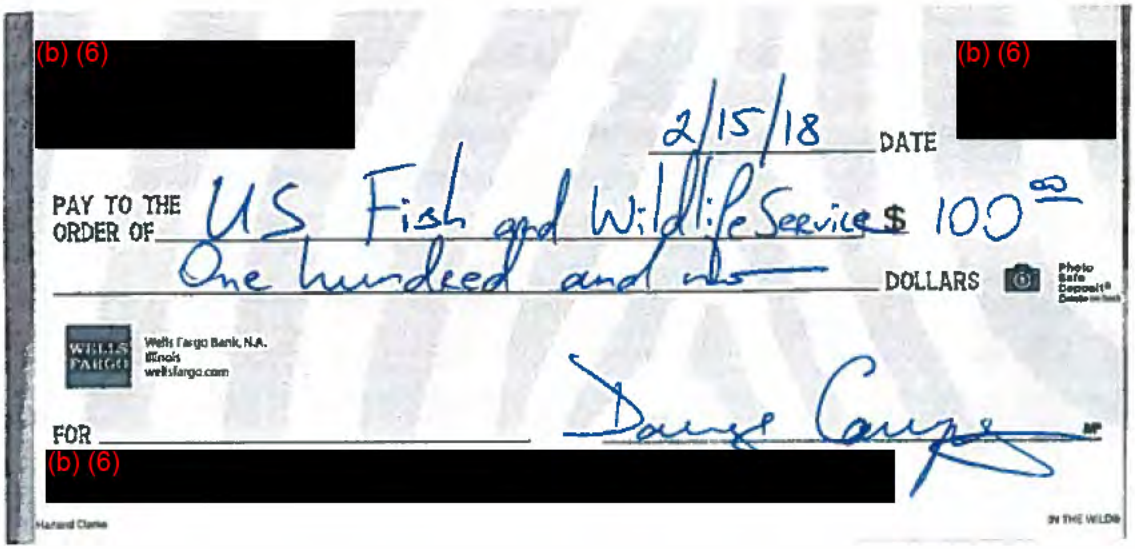
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information. Fedex account # (b) (6) [redacted]

☐ 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.


(b) (6)
(b) (6)
2/15/18
DATE
PAY TO THE ORDER OF
US Fish and Wildlife Service
$ 100 00
One hundred and no
DOLLARS
Photo Safe Deposit
Wells Fargo Bank, N.A.
Illinois
wellsfargo.com
FOR
(b) (6)
Harland Clarke
IN THE WILDS

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
(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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cater	Paul	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Katy	Texas	(b) (6)		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US691588/9 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.

Paul Cater — 02/06/2018

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.

      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:

      Zimbabwe Save's Conservancy

   b. Date wildlife is to be hunted: 6/19/2018 – 7/12/2018

   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

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: Leon Du Plessis
Business Name: Save Safaris
Address: Box CH 381
Address: Chisipite
City:
State/Province: Harare
Country, Postal Code: Zimbabwe N/A

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: N/A Date: N/A

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: [signature] Date: 02/04/2018

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):

N/A

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):
Attorneys at 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.

(b) (6)
(b) (6)
DATE 2/8/18
PAY TO THE ORDER OF US Fish and Wildlife Service
$ 100.00
One Hundred 00/100 DOLLARS
CHASE
JPMORGAN CHASE BANK, N.A.
WWW.CHASE.COM
FOR
(b) (6)

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: Eric M. Jahde

Name: Eric M Jahde

Date: 02/15/2018

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 (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: Jahde	1.b. First name: Eric	1.c. Middle name or initial: M	1.d. Suffix: N/A
2. Date of birth (mm/dd/yyyy): (b) (6)	3. Social Security No.:	4. Occupation:	5. Affiliation/ Doing business as (see instructions): N/A
6.a. Telephone number: (b) (6)	6.b. Alternate telephone number:	6.c. Fax number:	6.d. E-mail address:

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: Parker	1.c. State: CO	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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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.

Eric M. Jahde — 02/15/2018

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.

      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:
      Mokore Camp, Save Valley Conservancy, Masvingo, Zimbabwe

   b. Date wildlife is to be hunted:
      October 1 - October 21, 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 and claws, skull and teeth, all parts for a 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):
      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: Gary Duckworth
Business Name: Mokore Safaris
Address: 7 Stable Close
Address:
City: Borowdale, Harare
State/Province:
Country, Postal Code: Zimbabwe

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, Bubye and Save Valley Conservancies, Zimbabwe authorities, safari operators, and others

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: [signature] Date: 02-15-2018

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):*
Attorneys at 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.

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

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January 31, 2016

BUBYE VALLEY CONSERVATION RESEARCH
ZIMBABWE

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SUMMARY OF STEPS TAKEN BY ZIMBABWE TO IMPROVE THE MANAGEMENT OF LION SPORT-HUNTING

i – Banning of all lioness hunting in Zimbabwe
ii – Hunting moratoria around the Gonarezhou and Hwange National Parks
iii – Removal of fixed hunting quotas
iv – Age restrictions on sport-hunted lions
v – Scientifically-based adaptive quota management system

SUMMARY OF LION SPORT-HUNTING'S CONTRIBUTION TO CONSERVATION

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
ii – Lion sport-hunting generates up to US$ 557 km^{-2}
iii – Anti-poaching (in particular that of rhinoceroses) costs ~US$ 216 km^{-2}

INTRODUCTION

THE United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*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*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

LIONS – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

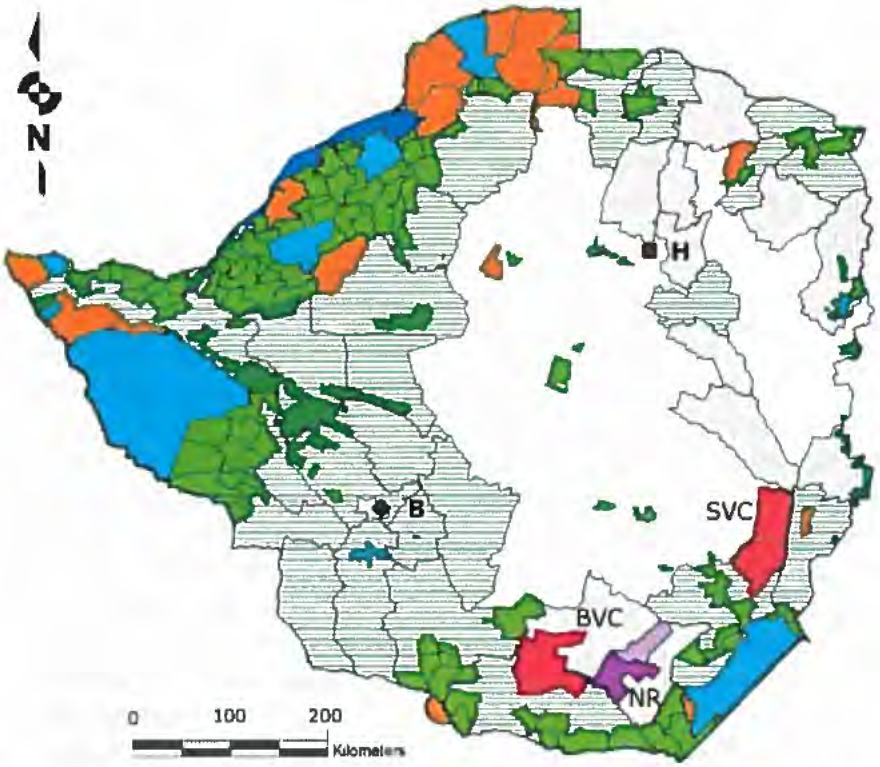

Figure 3: Map of Zimbabwe's main wildlife areas: |*i*| National Parks are represented in light blue; |*ii*| Safari areas are represented in orange; |*iii*| Forestry areas are represented in dark green; |*iv*| Community and Private wildlife areas are represented in light green; |*v*| Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; |*vi*| Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. |*vii*| The Bubye Valley |BVC| and Savé Valley |SVC| Conservancies are represented in red. |*viii*|The Nuanetsi Ranch |NR| on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); |*ix*| Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii*, *iii*, *iv*, *v*, *vii* & *viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

CONSERVATION AND SPORT-HUNTING

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

ZIMBABWE'S ADAPTIVE LION QUOTA MANAGEMENT SYSTEM

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately $150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

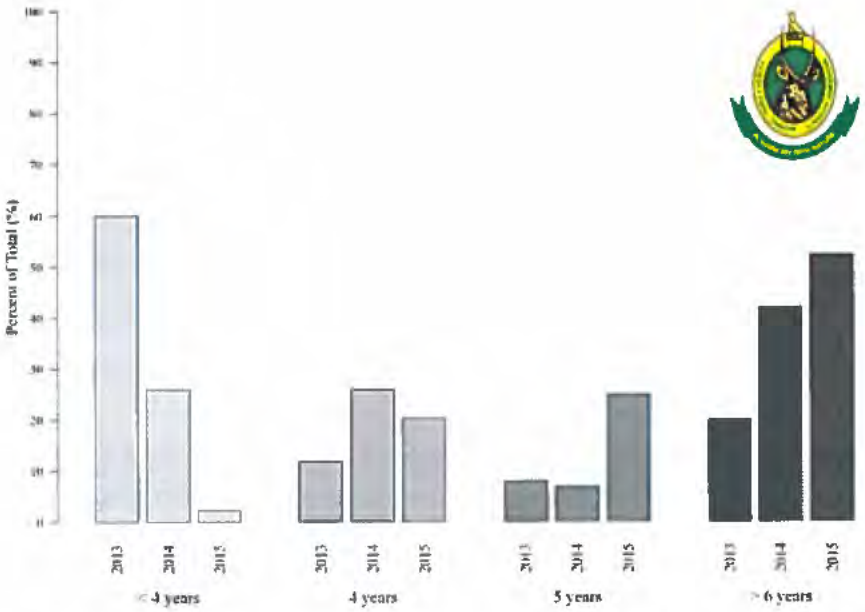

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

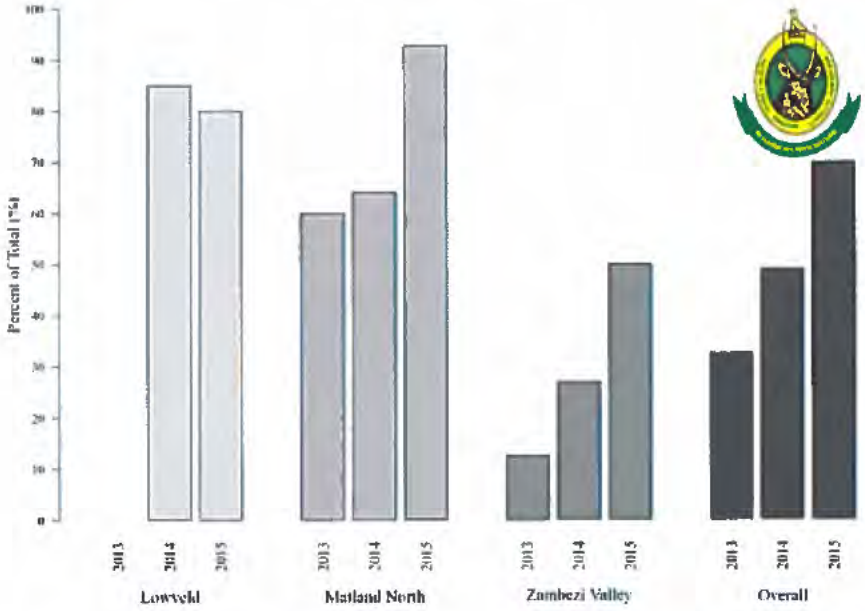

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

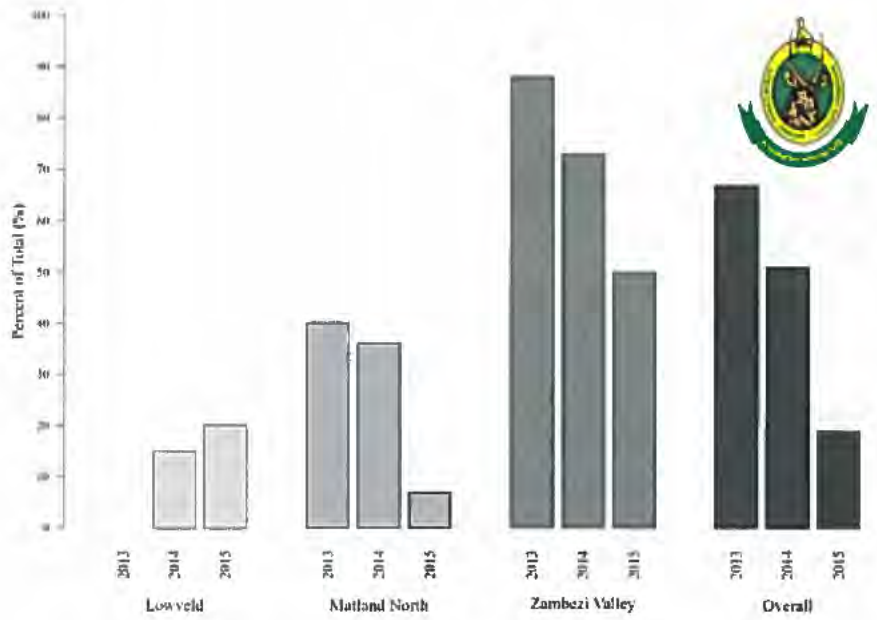

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People injured*	*People killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	44	183	*2*	*7*

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

THE BUBYE VALLEY CONSERVANCY

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

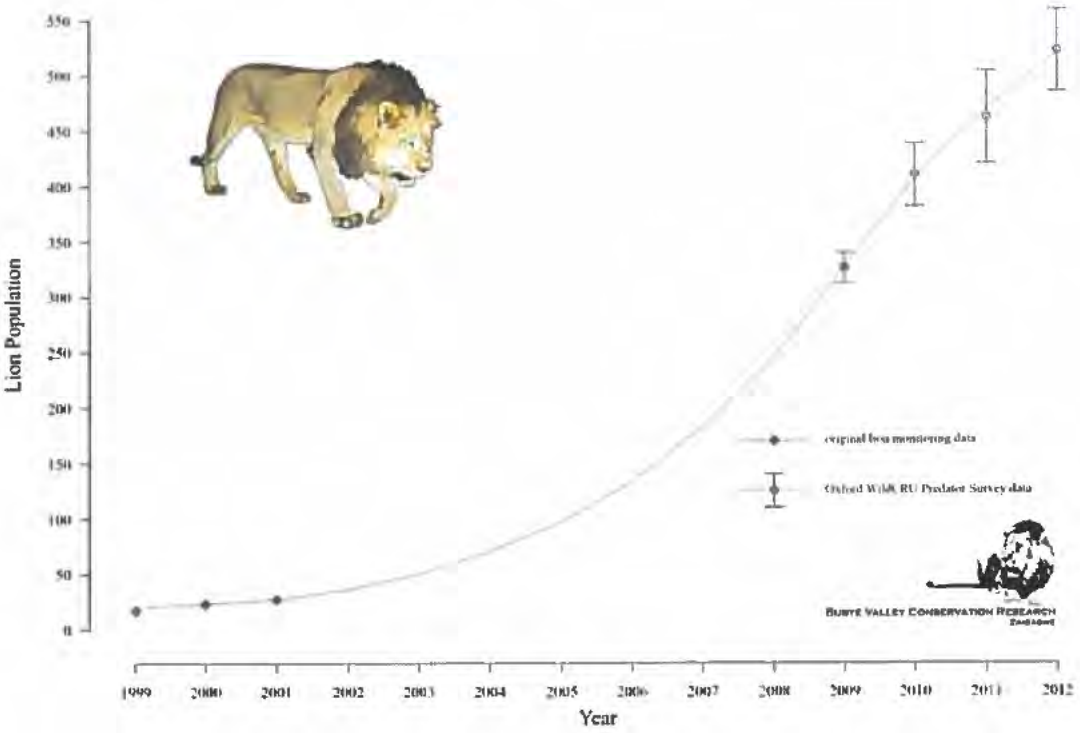

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water* - Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.* - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand erected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Bell Bridge RDC self funding projects up and running* - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange - Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Bell Bridge & Mwenezi districts* - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations* - 1000 kgs of meat per month is been donated to Bell Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports* - Transport the soccer teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions* - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC* - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b'holes in the Vumhani area are done by BVC* - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botatele Clinic (Maranda) borehole - Water supply to Mielezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project* - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Bell Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School - Supply of 24 loads of riversand to Mdzwiti School (value $1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

THE SAVÉ VALLEY CONSERVANCY

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

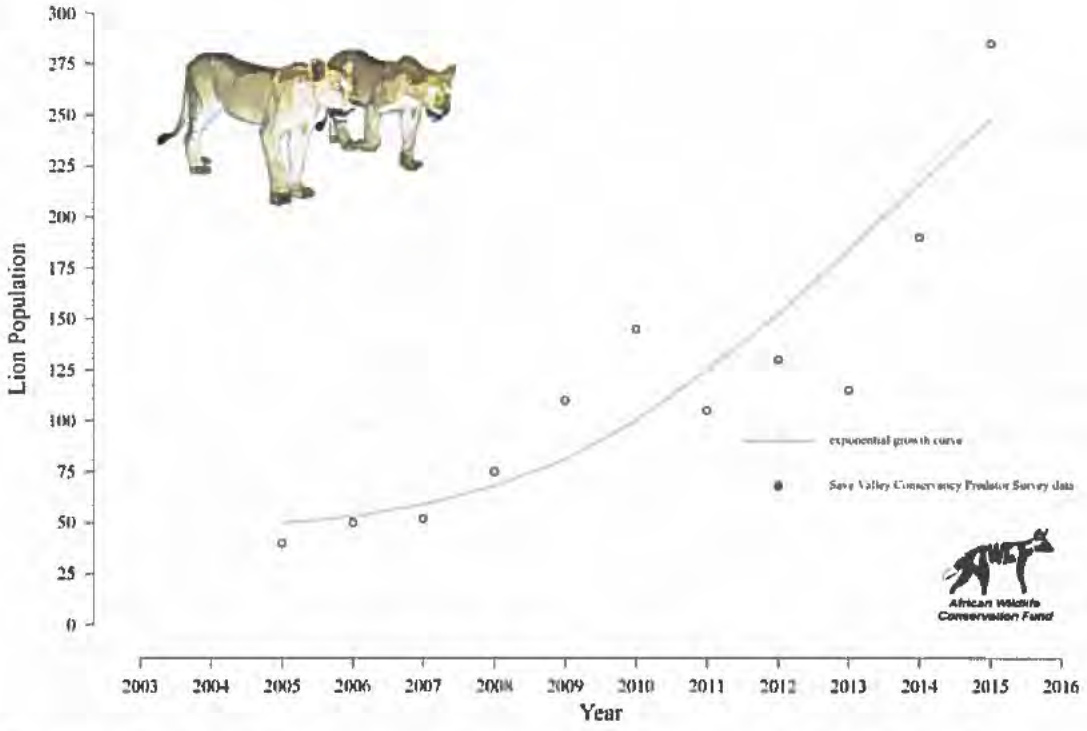

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

THE PROS AND CONS OF CONSERVING LIONS

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

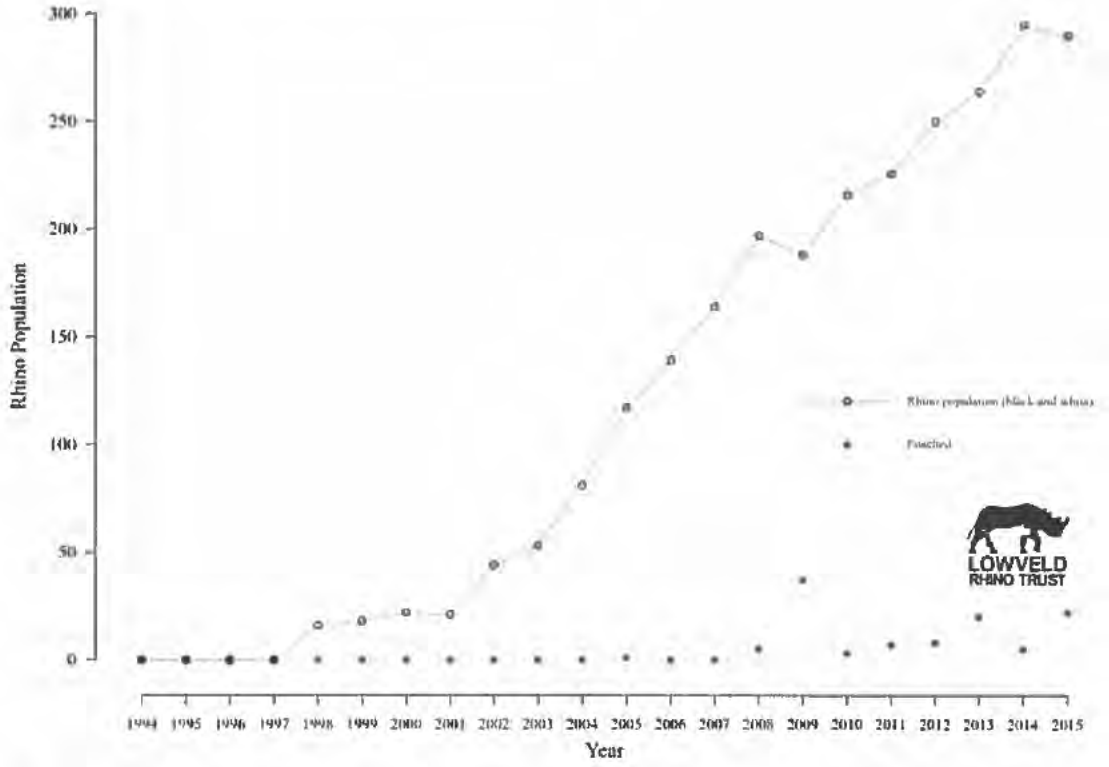

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

WHERE THE MONEY GOES: THE FINANCES OF LION SPORT-HUNTING AND REINVESTMENT IN THEIR CONSERVATION

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion $hunt^{-1}$*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion $hunt^{-1}$*]

BUBYE VALLEY CONSERVANCY - LION SPORT-HUNTING REVENUE GENERATED (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 $year^{-1}$), research (approximately US$ 34,700 $year^{-1}$ not including client and sponsor donations), and community support assistance (approximately US$ 210,000 $year^{-1}$).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

DISCUSSION

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

CONCLUSION

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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Lion Hunting in Zimbabwe's Savé Valley Conservancy

Dr Rosemary Groom, African Wildlife Conservation Fund
(On behalf of the members of the Savé Valley Conservancy)

27th January 2013

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members then restocked the wildlife population (4410 animals; Table 1), removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	**Total**
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	685	-	-	-	**685**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	-	**3**	-	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4410**

3 Trophy hunting versus Photo tourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhino now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancelation of the confirmed bookings. After four years of

seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

4 Lions in the Savé Valley Conservancy

After the conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990s / early 2000s. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004-5 there were some reports of cubs. During this period 13 lions were also reintroduced into SVC. After an initial lag phase the lion population on SVC has increased dramatically and at present is growing exponentially (Figure 1, Groom 2012).

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the lion population is currently only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless population control measures are implemented.

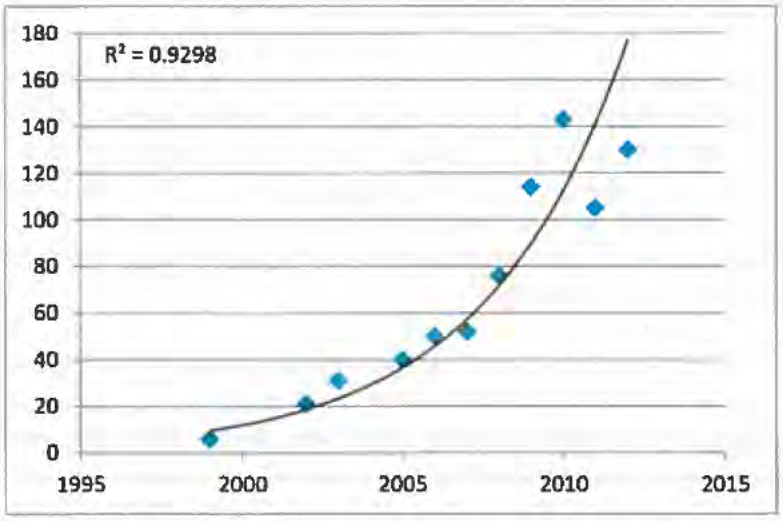

Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

It should be noted that lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed annual investments of US$ 150,000 – 240,000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). In addition, a central anti-poaching unit operates specifically to provide protection for the conservancy's black rhino, *Diceros bicornis*, population (one of only three remaining populations in Zimbabwe that is defined as having long-term viability in demographic and genetic terms). The operating costs of this unit amount to over $200,000 per year and are shared between the conservancy members and donors. As rhinos are not trophy hunted in Zimbabwe, members' share of these costs need to be generated some other way – and lion hunting is an important contributor. Thus a removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs, *Lycaon pictus*, and especially black rhinos.

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers.

The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

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WHITETAIL DEER
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15 Feb. 2018
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Harland Clarke
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May 3, 2018

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

Re: Supporting information for applications PRT 84787C and PRT 78392C

Dear Ms. Barry:

Enclosed please find information to further support the enhancement generated by regulated hunting for two import permit applications that we believe have been assigned to you.

- The first, PRT 84787C, is hunting with Martin Pieters Safaris in Zimbabwe. Mr. Pieters responded to some questions about the anti-poaching and community benefits generated by hunting in the Matetsi Safari Area. Please consider this information in making a positive enhancement finding for this applicant, and please consider the Non-Detriment Finding submitted by the Zimbabwe Parks and Wildlife Management Authority (October 2016), which provides information about the benefits of regulated lion hunting in Zimbabwe's Safari Areas.
- The second, PRT 78392C, is hunting with Gary Duckworth in Save Valley Conservancy in Zimbabwe. We have previously submitted extensive information about SVC, but the operator has provided more. Among other things, this information demonstrates the operator's commitment to habitat conservation and anti-poaching, and the scientific process employed in ensuring healthy wildlife populations and sustainable use. Please note, the operator has also provided more specific information about the location of this hunt (e.g., GPS coordinates and the closest city). He has also provided the PH name. This was not initially provided because this applicant submitted the application prior to release of the new forms. Finally, the operator has corrected the "shipper" for what was question 4 and is now question 8 (the name and address of the person or business shipping the trophy). Would you please substitute this corrected information in place of Mr. Duckworth's name when the final permit is issued. Please let me know if you have questions, and please consider the enclosed information in making a positive enhancement finding for this applicant.

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

Sincerely,

Regina Lennox

CC: Acting Chief, Branch of Permits

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

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

enhancement details

Martin Pieters (b) (6) Wed, Apr 11, 2018 at 9:45 AM
To: regina.lennox@conservationforce.org
Cc: aaron Baker (b) (6), Aaron Baker (b) (6), "Eubulus Kerr, (b) (6)

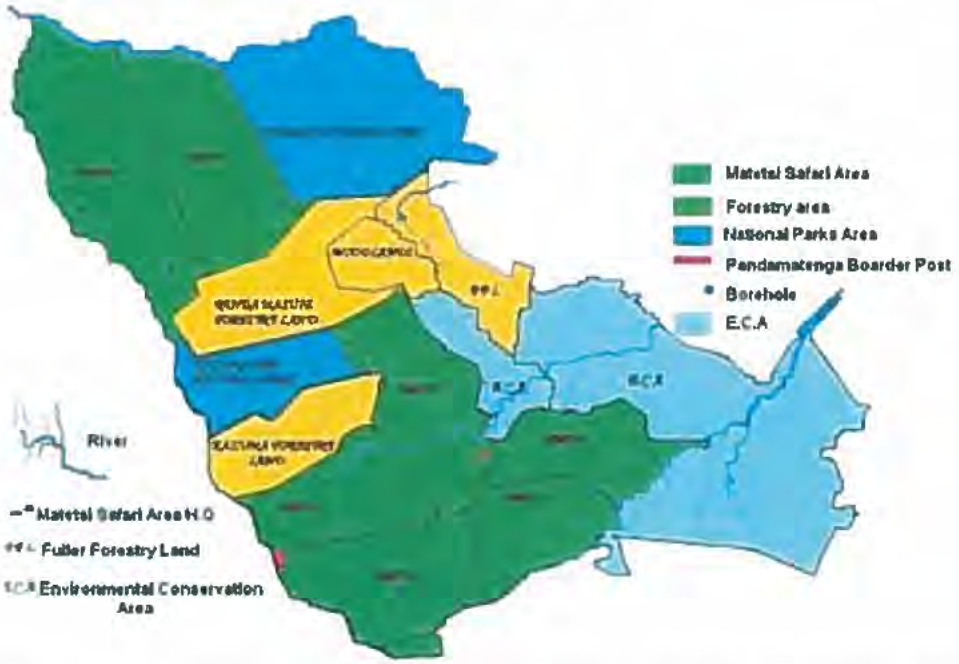
Dear Regina

Sorry for the delay.
I actually have two USA clients hunting lion, Aaron baker (b) (6) actually he has hunt shot his lion with me and will be in touch) and Eubulus Kerr (b) (6)

Both lions will be hunted in the MATETSI region which is a controlled hunting area governed by the Zimbabwe National Parks and Wildlife Authority.

1.

MAP II: MATETSI SAFARI AREA SHOWING THE SIX HUNTING UNITS, KAZUMA, PANDAMASUIE AND ICA.



2. The wildlife authority has all its own reports as they are in contra of the Matetsi safari areas.

3. The ZNPWA have been in control of the Matetsi safari areas for over 40 years and does all its own armed anti poaching as well as community assistance on its boundaries

4. For periodic reports, the ZNPWA would have all those documents.

5. Arial surveys and 48 hour game counts are conducted annually in the Hwange national park which lies

adjacent to Matetsi safari area and forestry hunting blocks.

6. Armed rangers are paid by the department of national parks and they get rewarded for successful apprehension of poachers.

7. It is a safari area hence no villages actually live in the area, the villages surround the hunting area and they benefit fro meat and off take from hunting clients which benefits them through the successful CAMPFIRE program.

8. Zimbabwe has a minimum age of 5 years with penalties to safari operators and professional hunters if an underage animal is shot.

9. Hwange National park which adjoins the matetsi block has a dedicated research team and many collared lion for research purposes. The lion population has increased dramatically over the last 5 years due to minimal quotas, successful ageing and community involvement.

10. Matetsi safari area is home to the one of the largest free ranging herds of elephant and buffalo in Zimbabwe. There are no fences and it adjoins hwange national park and Botswana where unrestrained movement of wildlife occurs.

Regards

Martin

Martin Pieters
www.martinpieterssafaris.com
(b) (6) [redacted]

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Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""

3 messages

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Subject: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""
Date: February 26, 2018 at 11:30:01 AM MST
To: (b) (6)
Cc: <permits@fws.gov>
Reply-To: <permits@fws.gov>

ERIC M. JANDE
(b) (6)
PARKER, CO (b) (6)
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/26/2018; check number 5497 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA78392C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Regina A. Lennox <regina.lennox.cf@gmail.com> Fri, Mar 23, 2018 at 9:51 AM
To: cf@conservationforce.org

Could you possibly call and get the legal examiner's name and email for this person? Thank you!

Begin forwarded message:

From: Eric Jahde (b) (6)
Date: March 22, 2018 at 1:24:56 PM CDT

> **To:** "Regina A. Lennox" <regina.lennox@conservationforce.org>
> **Subject: Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""**

[Quoted text hidden]

John J. Jackson, III <cf@conservationforce.org> Mon, Mar 26, 2018 at 11:34 AM
To: "Regina A. Lennox" <regina.lennox.cf@gmail.com>

Case manager, biologist

Name: Ann Barry

Email: Anna_barry@fws.gov

Sorry. Called them back this morning. They never returned my call. - AT
[Quoted text hidden]

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

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mokore Safaris Lion Hunt

1 message

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

Hi Regina,
This is the forward of mailing from Gary Duckworth with proper info as we discussed. I will also forward the PRT mailing from the government.
Thanks very much for your help and please contact me at any time if I can help.
Regards,
Eric M Jahde
(b) (6)

Begin forwarded message:

From: Eric Jahde (b) (6)
Subject: Fwd: Mokore Safaris Lion Hunt
Date: March 21, 2018 at 5:26:00 PM MDT
To: Eric Jahde (b) (6)

Begin forwarded message:

From: "Gary Duckworth" (b) (6)
Subject: RE: Mokore Safaris Lion Hunt
Date: March 8, 2018 at 8:41:56 PM MST
To: (b) (6)
Cc: (b) (6) "'Rob Oostindien'" (b) (6) "'Neil Duckworth'" (b) (6)

Good morning Eric,

I hope this finds you well and being successful with your application. I see a recent ruling by USFW is favourable. I thought to send you some information that may help with your application. Sorry I didn't send before but forgot I had these. I have attached some notes that I had written up before. Also attached are our leopard data from Mokore just to show our healthy predator population and also the data we use to try and ensure we judge the lion's age correctly from our trail camera pictures. Also a copy of our PH rules sent to any PHs operating in our areas showing the seriousness we have to ensuring the right animals are harvested. Don, do you have any more recent counts on the SVC lions. I think he last year's count was 225. Still 75 lions above what our ecologists say is

sustainable. I have also copied in a document Neil did on Conservation Through Hunting which shows our companies dedication to these areas even though this is for Mozambique it is our company MO.

Answers that you may need from the permit application if not already done:

1. Page 3, #5 a and c.
2. Page 4, #8.
3. Page 4, #9 a, b, and c.

Page 3 5a) Mokore and Umkondo Ranches, Save Valley Conservancy, Bikita District, Masvingo Province. South Eastern Lowveld. Closest cities Masvingo and Mutare. Mokore Camp – S 20 24' 12.01" E 032 07' 01.88"

5c) Mokore Safaris, Gary or Neil Duckworth as PHs. Gary PH license number 96. Neil PH license number 94.

Page 4 8) Name: Cuan Meredith
Company: Trophy Consultants International
Address: 4 Josiah Chinamano Road, Belmont
City: Bulawayo
Province: Matabeleland
Country: Zimbabwe

9a) Please see attachments
9b) Please see attachments
9c) Please see attachments

I hope this all helps. Good luck.

From: Gary Duckworth (b) (6)
Sent: Thursday, February 15, 2018 4:12 PM
To: (b) (6)
Cc: (b) (6) 'Rob Oostindien'
Subject: RE: Mokore Safaris Lion Hunt

Hi Eric,

Thank you. Lynn will send you a list of things she needs for processing permits, etc. Good luck with the permit.

From: (b) (6) [redacted]
Sent: Wednesday, February 14, 2018 4:50 PM
To: Gary Duckworth
Subject: Re: Mokore Safaris Lion Hunt

Thank you Gary,
My application is in the works with John Jackson's help. I will wire the deposit to your account here in Mississippi today for the lion hunt in October 2018. Is there any other paper work that I need to start with you?
Eric Jahde

Sent from my iPhone

On Feb 14, 2018, at 7:35 AM, Gary Duckworth (b) (6) [redacted] wrote:

Good afternoon Eric,

I hope this finds you well. Rob had asked me to assure you that should you not get the import permit for the lion into the USA that we would either return your deposit to you or allow you to roll it over to another year or safari. All deposits are held in an account in Mississippi with our agents at African Horizons. Should your application be turned down for the import of the lion then they (African Horizons) can easily return your deposit should that be your wish. Looking at the fish and game website I am fairly confident that your application should have a positive outcome especially since the Save has not only enough lions, but possibly too many! Please do not hesitate to contact me should you have any further queries.

<image001.jpg>
<image002.jpg>

10 attachments

Kind regards

Gary Duckworth

Mokore Safaris
7 Stable Close,
Borrowdale, Harare
Zimbabwe

Phone +263-(0)4-883462
Mobile +263-(0)772 260-178
skype gary.duckworth3
www.mokoresafaris.com
www.mokoreecosafaris.com

image001.jpg
30K

image002.jpg
6K

Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx
20K

Leopard Data.pdf
3571K

aging_the_african_lion.pdf
5125K

Mokore Safaris PH Rules.pdf
176K

SVC Predators 2015.docx
26K

Zimbabwe Rates 2018.pdf
508K

AN EXAMPLE OF CONSERVATION THROUGH HUNTING [5741].docx
9659K

USFWS Lion Permit App.pdf
70K

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

Leopard Data 2015/2016

Mokore and Umkondo Ranch

Savé Valley Conservancy

Introduction

Leopards (*Panthera pardus*) are found throughout Mokore and Umkondo Ranches with in Savé Valley Conservancy (SVC). Mokore Safaris has been hunting leopard for numerous years as a form of trophy hunting or sustainable utilization. Trophy hunting consists of targeting mature male individuals, and as of more recent, individuals aging older than approximately four (4) years in age. The purpose of this document is to identify randomly selected bait sites and the leopards identified at these specific bait sites.

Method

The Professional Hunter or individual tasked with pre-baiting or baiting for leopard chose a randomly selected bait site in attempt to lure a male leopard into feeding. Due to the fact that females also utilize bait sites, records on any females feeding are also monitored. The selected bait sites are randomly chosen throughout Mokore and Umkondo Ranches. Camera traps or trail cameras are then placed at all bait sites. For identification purposes, it is attempted that all leopards captured feeding with the camera placed in such a manner that the right side of the leopard is photographed. This is however not always possible due to preferred bait site selection. It is thus recorded which side of the leopard pictures are taken of.

Male leopards are given names that aid in either easily identification of the cats or are named as per the bait site that they initially feed on. Females were named simply by property and in numerical order. For example, a female leopard feeding at the Gwezi River bait site on Mokore would be named MF001. If this female had a cub feeding alongside her, the cub would be named MJ001 and would have a recording that the cub belongs to MF001. Where MF is Mokore Female and MJ is Mokore Juvenile. The sex of each leopard was also recorded. For all juveniles the sex is recorded as unknown due to difficulties in identifying sex at a young age.

Photos are saved of all cats recorded either a right side, left side or both sides where possible. If a cat was found feeding on a different bait site, this was also recorded. An estimated age was also assigned to each male that was found feeding. The age was estimated using the Panthera ageing guidelines as well as PH age estimations.

Image 1: Randomly selected bait sites throughout Mokore and Umkondo Ranches.

Results

Due to the fact that Mokore Safaris utilize two (2) properties, the data is classed into two groups, namely Mokore Leopard and Umkondo Leopard. A total leopard population is also determined due to the fact that holistically the same company treats these blocks as one management unit. It is to be mentioned that the data is based on some of 2015 and all of 2016 hunting season. Majority of the data for 2015 produced errors upon processing. However some data is made available on leopards being taken and locations thereof.

Mokore Leopard

The data gathered for Mokore is based on information gathered by randomly selected bait sites as mentioned above. It can be noted that a large portion of Mokore went without being baited, close on 2 000 ha. For the purpose of this document, this 2 000 ha was not excluded from the total area. It is hypothesized that this will have an effect on the total leopard numbers as well as leopard densities found on Mokore Ranch.

All data is separated into two classes, namely pre and post hunting. It is deemed that other males who in turn will occupy the available territory replace males removed from Mokore.

A. Pre-hunting leopard numbers and densities

Mokore Ranch is approximately 7 841 ha in size. A total number of fourteen (n=14) leopard were identified on seven (7) bait sites throughout Mokore. It can be noted that a total number of five (5) bait sites fell in close proximity to the Turgwe River. As previously mentioned, the centre and north-eastern area of Mokore was found free of baits. This does however not mean that no leopard utilize this area. A total number of five (5) males, six (6) females and three (3) juveniles were identified on Mokore.

Densities of Mokore resulted in 560 ha/leopard. Males had an average density of one (1) male per approximately 1 568 ha. Females and Juveniles having an approximate density of one (1) individual per 871 ha.

B. Post hunting leopard numbers and densities

For the purpose of the document, it is concluded that a total number of two (2) male leopards were removed from the population in 2016. This in turn results in a lower density of male leopard for Mokore. This density being approximately 1 000 ha larger per male in post hunting than what it was in pre-hunting conditions. It can however again be mentioned that these available territories will become occupied by other males moving into the area.

Umkondo Leopard

The data collection for Umkondo is done in the same manner as on Mokore. It can also be noted that on Umkondo, no bait sites were place within an area of approximately 1 300 ha in size, namely around the Mokore River west of the main road. This area is adjacent to that of the area that was not baited on Mokore Ranch.

A. Pre-hunting leopard numbers and densities

Umkondo Ranch is approximately 6 736 ha in size. A total number of eleven (11) leopards were identified on six (6) baits throughout Umkondo. A total of number of four (4) males were recorded, five (5) females and two (2) juveniles. A total density of approximately one (1) leopard per 612 ha presented itself on Umkondo. Males had an average density of 1684 ha per individuals. Females and Juveniles had an approximate density of 962 ha per individual.

B. Post hunting numbers and densities

A single (1) individual was removed from the population on Umkondo Ranch for 2016. As a result of this the male density differs approximately 560 ha greater per individual post hunting.

Combined Data

Combined a total of twenty five (25) leopard were identified, with an approximate density of 583 ha per leopard. Males having an approximate density of 2 429 ha per individual and females and juveniles 911 ha per individual. This data is based on the post hunting data. Numbers and densities will change pre-hunting season 2017 depending on whether or not available territories become occupied. A large area of approximately 3 300 ha has also gone un-baited. This will also affect leopard numbers and densities especially when considering females and possibly juveniles.

Discussion

When considering data pertaining to this document it is important to note that some leopards both on Mokore and Umkondo would have been missed due to numerous reasons. Main reasons are areas being devoid of baits and the possibility of males not feeding on baits is not to be ignored. It is hypothesized that the 2017 pre-hunting season will yield higher numbers and densities of leopards, especially males.

A total number of three (3) leopards were removed from the population in 2016, two (2) on Mokore and one (1) on Umkondo.

Table 1: Identification sheet of leopards on Mokore.

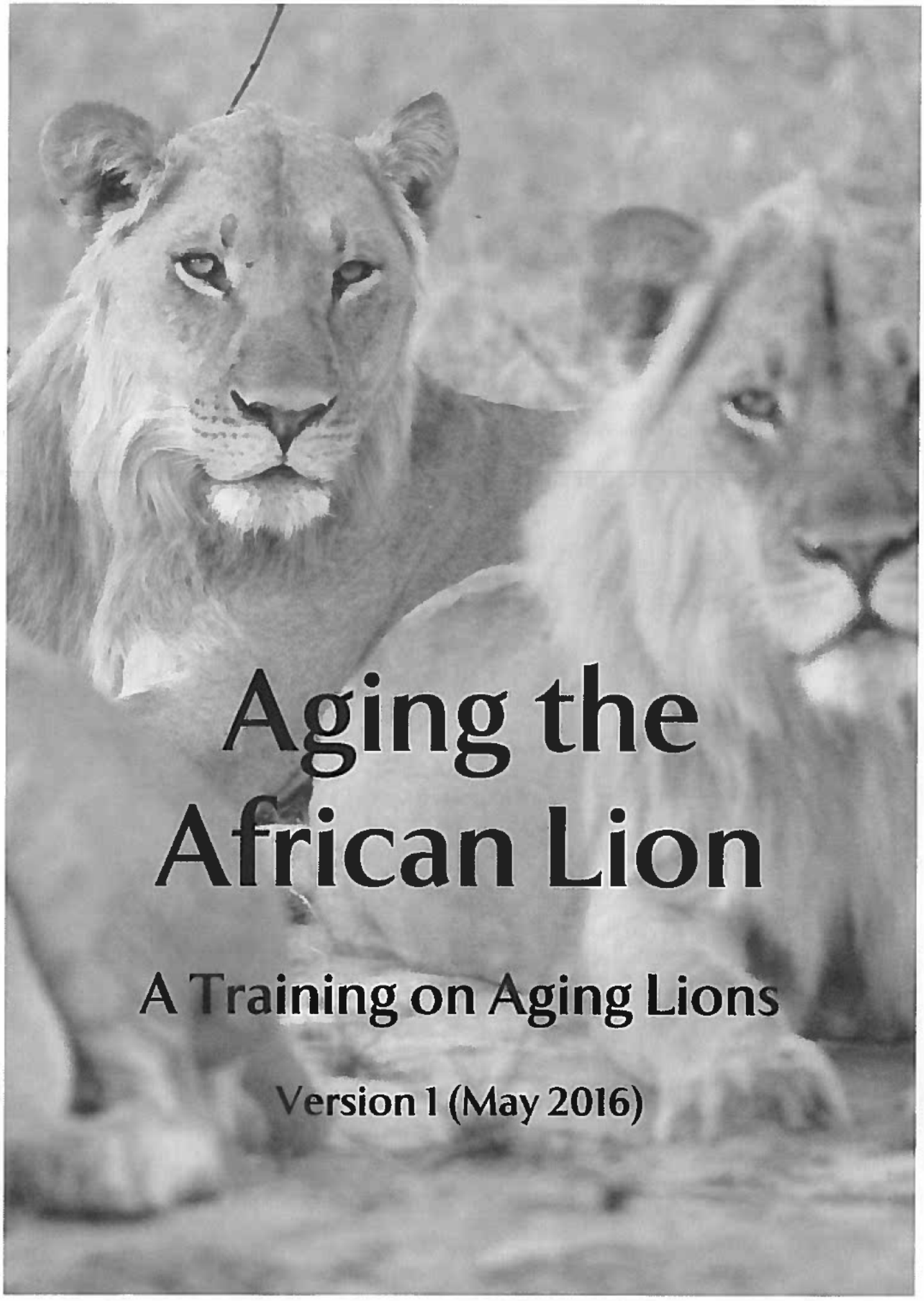
Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
Boma cat	M	3		Boma, Savuli Boundary	398805	7750153
MF001	F			Boma, Savuli Boundary	398805	7750153
JM001	Unknown		MF001	Boma, Savuli Boundary	398805	7750153
The King	M	4		Mdala Pan Bait Site	401161	7744365
Shlabata Cat	M	6		Billys Bait site	405746	7743229
MF002	F			Billys Bait site	405746	7743229
MF003	F			Gwezi Bait Site	406370	7744543
JM002	Unknown		MF003	Gwezi Bait Site	406370	7744543
2 Smile	M	3		Billys Bait site	405746	7743229
MF004	F			Mokore River, Crowned Eagles Nest	406968	7748034
MF005	F			Bow Stream	408794	7743750
Bow Cat	M	4		Bow Stream	408794	7743750
MF006	F			Majewe Weir	402133	7742862
JM003	Unknown		MF006	Majewe Weir	402133	7742862
Muchwa Cat	M	3		Majewe Weir	402133	7742862

*MF	Mokore Female
*JM	Juvenile Mokore
	Male removed from Population

Table 2: Identification sheets of leopards found on Umkondo.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
UF001	F			3 spots bait site	408167	7754697
5c	M	4		Umkondo Mine Dam	410765	7752730
Zizi Dip Cat	M	4		Thierrys Bait Site	415070	7755639
UF002	F			Thierrys Bait Site	415070	7755639
JU001	Unkown		UF002	Thierrys Bait Site	415070	7755639
Dick and Balls	M	4		Umkondo/Sango Nothern Boundary	407314	7753919
UF003	F			Umkondo/Sango Nothern Boundary	407314	7753919
UF004	F			Bedford Tanks	410316	7749369
UF005	F			Torchwood Bait Site	416065	7752784
JU002	Unkown		UF005	Torchwood Bait Site	416065	7752784
3 spot	M	5		3 spots bait site	408167	7754697

*UF	Umkondo Female
*JU	Umkondo Juvenile
	Male removed from population



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Background and Applications

Lions in Africa

As the dominant predator in Africa, the African lion (*Panthera leo*) is highly valued for its ecological role and importance for the tourism industry. However, lions have declined by an estimated 42% over the past 21 years (3 generations) to approximately 20,000 individuals (Bauer et al. 2015). Robust tools for assessing and managing lion population dynamics are critical for survival of the species.

Why Age Lions?

Age is a common metric used throughout the world to guide the management, research and sustainable harvest of many types of wildlife, including large carnivores, ungulates and fish. Knowing an animal's age is critical for accurately estimating key elements of wildlife behavior and life history, such as reproduction, survival, movement and population size. Our ability to successfully conserve and manage wildlife depends on how well we understand each animal's social and biological role, which is closely tied to age.

Implications for Management and Research

Managers use population models based on the age structure of a population to help predict how different management scenarios or environmental stressors might affect the future of a species. Population models project a species' population size based on information about a species' life history, including conception rate, birth rate, survival of young, age at puberty, territoriality and other behavioural characteristics. The age or life stage of an animal is closely tied to its reproduction, survival, behavior, and other aspects of its ecology that can affect population stability. Thus, an animal's age in the context of its population can provide valuable information about the future of a single population and, for threatened species like the African lion, even the species as a whole.

For this reason, age is an important metrics collected by lion researchers. For example, researchers that collar individual lions must be able to accurately age the lions they study in order to understand lion behaviour in a broader context. Ensuring that lions have the natural resources and the protection that they require at different phases of their lives is critical for ensuring their conservation.

Importance for Sustainable Hunting

Lions are the only social big cats in the world. Each pride consists of 4-5 adult lionesses, their dependent cubs, and a temporary coalition of pride males. Pride males play a key role in defending their pride against invading males by forming coalitions of 2-3 males to defend the pride territory through roaring, patrolling, scent marking and aggressively approaching invading males. When new males enter a pride, they often kill cubs (a behavior termed "infanticide") in order to bring lionesses into estrus more quickly so they can produce offspring. Infanticide

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

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

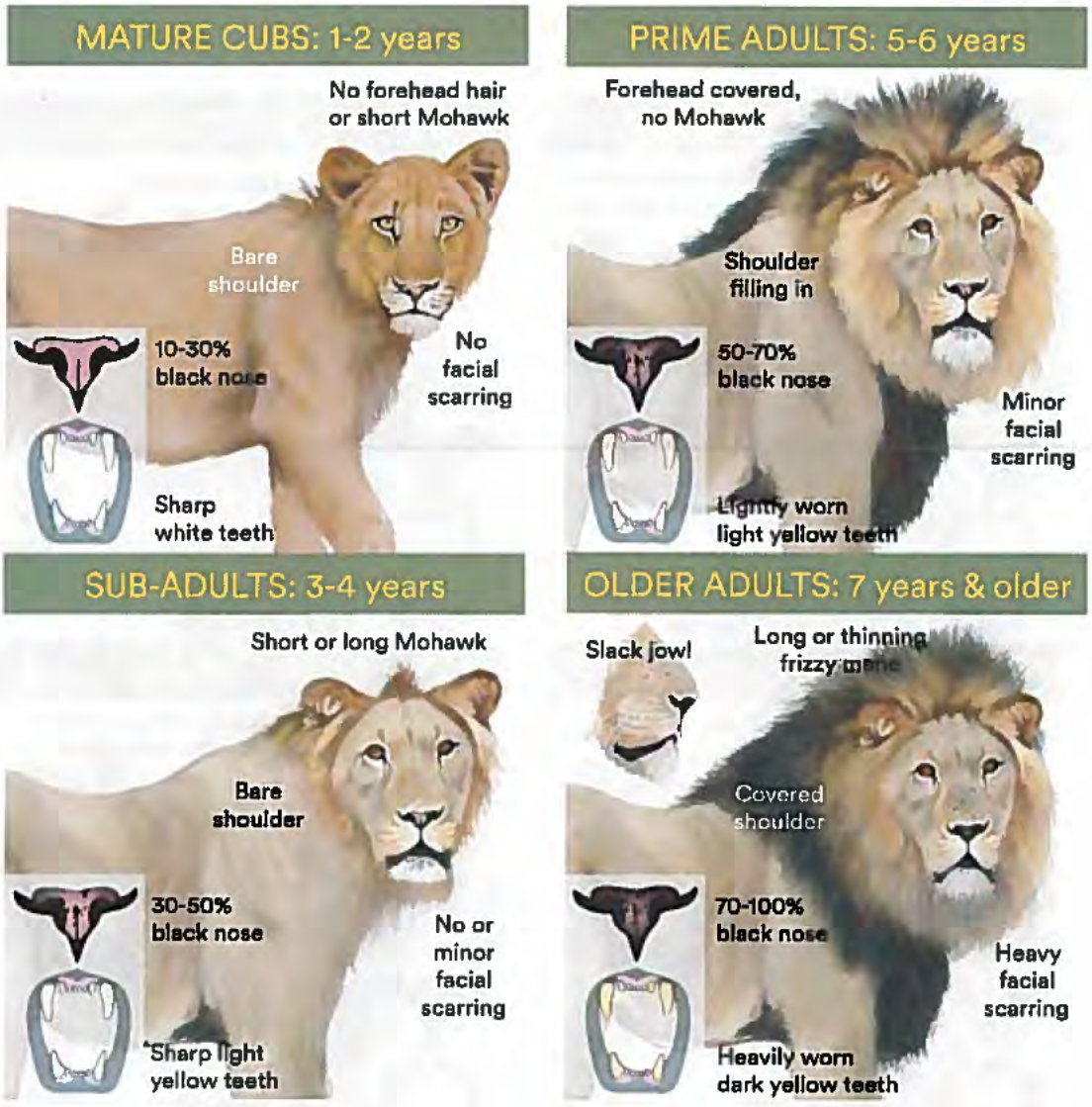
After You Finish: Re-Test Yourself

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

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



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

Mokore Safaris PH Rules

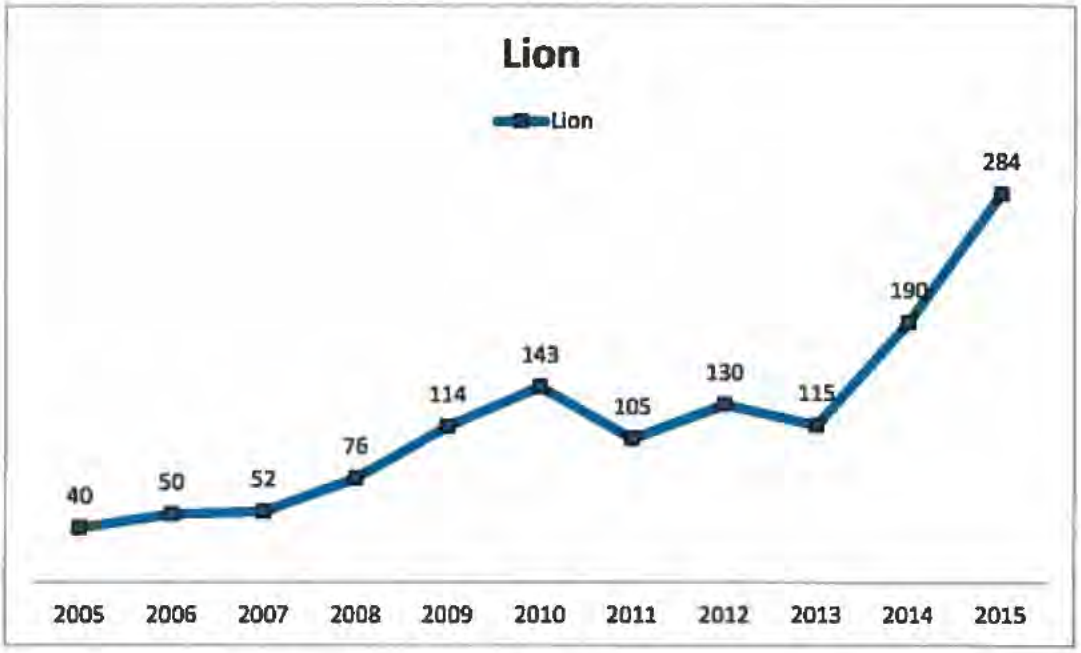
1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save 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 skinners 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. 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

SVC Predators 2015

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:



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

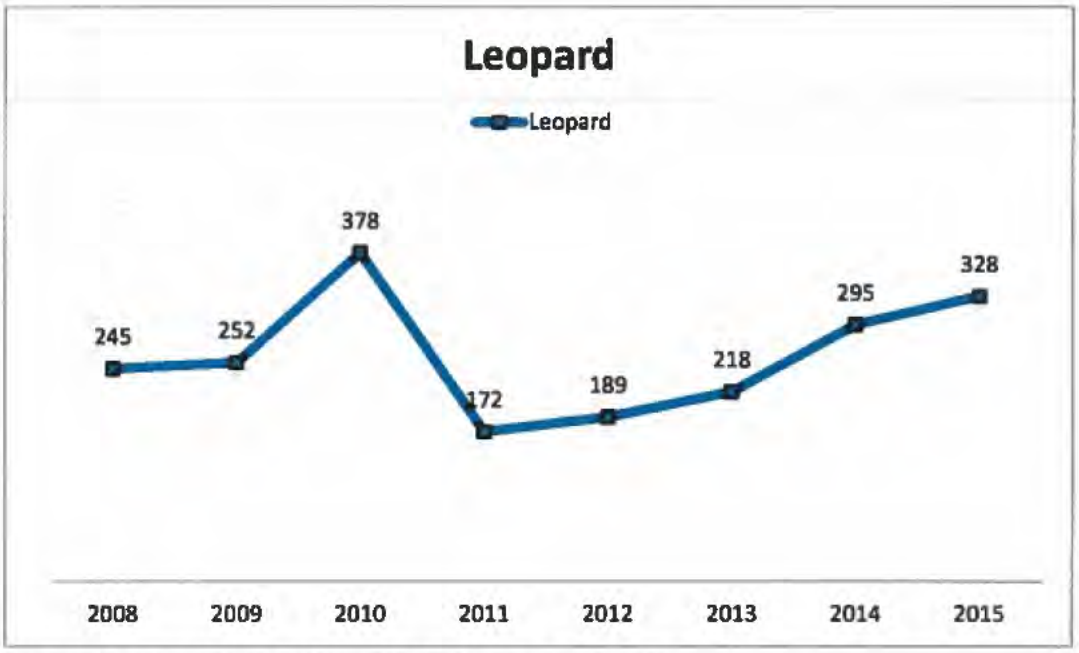


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.

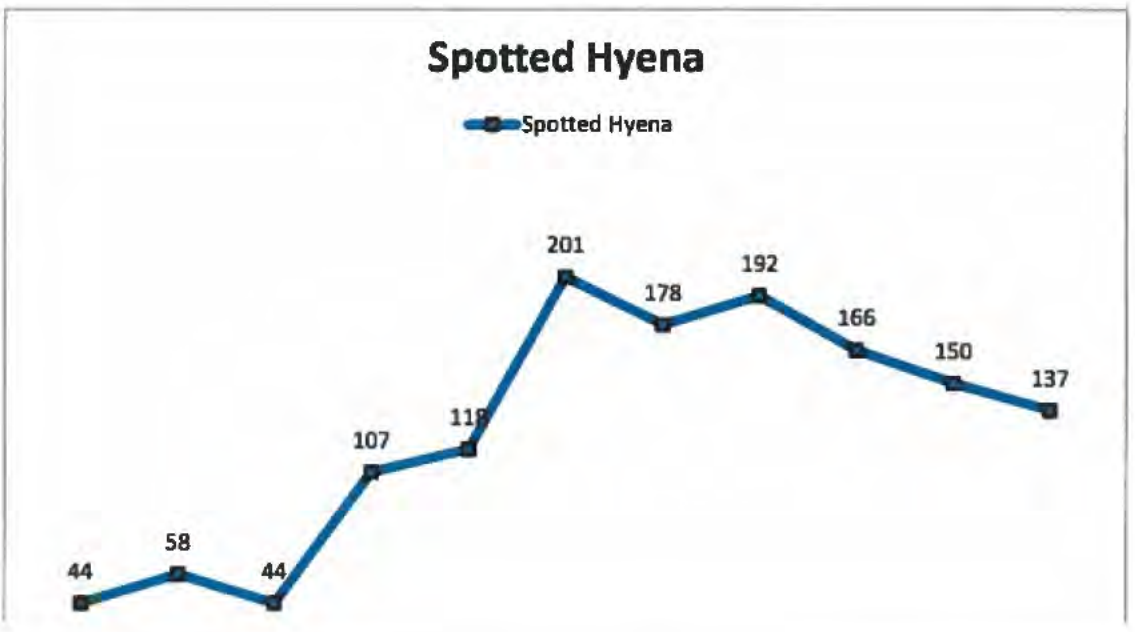


Image 3: Population trends for Spotted Hyena of the SVC from 2005 to 2015.

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

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 - $1,500/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	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	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

ANOTHER FINE EXAMPLE OF CONSERVATION THROUGH SUSTAINABLE AND ETHICAL HUNTING.

Prior to 2002, Coutada 9, like all other wilderness areas in Mozambique, had been through over 25 years of civil war and rampant poaching. This massive area (4333 square kilometres) was left virtually devoid of wildlife. Furthermore, the area suffered serious habitat destruction, being subjected to annual late season bushfires and the indiscriminate cutting of trees through "slash and burn" agricultural practices. In 2002, Rio Save Safaris, took over the concession and set out to re-habilitate the area to its former glory. Firstly, they needed to take control of the massive poaching epidemic and provide surface water for the very limited remaining wildlife.

Over the past 13 years RSS has drilled 22 boreholes and constructed 12 large dams, these provide permanent surface water for the wildlife in Coutada 9. This water is essential for life and all species benefit, including birds, smaller mammals as well as insects. The construction of these dams has been a lengthy and expensive exercise.

Some of the completed dams on Coutada 9 creating permanent surface water for the wildlife.

Since 2003 RSS anti-poaching teams have consistently removed over 1000 gin traps per year, caught on average 150 poacher per year and confiscated numerous homemade muzzle loader rifles as well as a few modern assault weapons like AK 47's from poachers. For EVERY weapon confiscated, poacher apprehended or trap removed RSS have paid an incentive bonus to the anti-poaching units. Due to these continuous efforts, the wildlife has thrived and flourished, to the stage where most populations have reached sustainable population densities.

A year's haul of traps and guns with some of RSS anti-poaching game scouts.

An elephant bull poisoned by villagers where nothing from the animal was utilised and one of the 150 poachers arrested annually by RSS anti-poaching units with his traps. Most poaching is done for commercial use and totally unsustainable.

Some species populations, however were so low that RSS set out to re-introduce these species. Not a small feat in itself considering no importation of wildlife or inter-area game transfers had ever taken place in Mozambique.

After 18 months of tireless negotiations, RSS imported 10 lions in September 2009 from Phinda Game Reserve in South Africa. They were transported and successfully released them into Coutada 9 over 1600 km away. They have settled and are breeding well in the coutada.

Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swop 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 2013. Waterbuck are now seen daily and breeding well.

Eland from Coutada 9 being released into Gorongosa National Park and the replacement Waterbuck into C9.

Waterbuck and eland successfully released .

A key priority from the outset, was to boost the local remnant buffalo population and after more than 10 years of trying to source buffalo from surrounding countries as well as within Mozambique. RSS was FINALLY granted permission from the Mozambique government to capture 50 buffalo as a trial from the Zambesi Delta reserve. This was finally achieved in 2015. The 50 buffalo are safe and sound in Coutada 9 with plans now to capture a further 250 next year.

The first 50 buffalo in their quarantine bomas, November 2015.

These projects and all other developments such as building of road networks, Safari Camps and staff accommodation to date have been funded through trophy hunting. RSS operates on a strict sustainable offtake quota where a small percentage, normally 2-5% of a population, is harvested. These animals are usually males past their prime and their removal has little impact on the overall species population.

All funds raised through trophy hunting to date, have gone back into the conservation and development of this magnificent area as well as to support the local communities. Unfortunately due to the remoteness of the concession and thick bush, photographic tourism is very limited and not a feasible option for this area.

RSS employ 50 game scouts for anti-poaching alone as well as another 60 plus people for all other development work required. This in turn provides over 100 families with a reliable source of income and food annually.

Of the animals harvested 25 % of the trophy fee received from foreign hunters goes directly to the local communities. RSS also supplies most meat to the community either directly through delivering it to the local villages or indirectly through issuing it to the staff working within the Coutada. The meat from ALL animals harvested is FULLY utilised, including lions, baboons and especially elephant.

RSS has also built a school, clinic and drilled boreholes for the surrounding communities. Many of our hunting clients have made donations to the school personally or in the form of delivering SCI Blue Bags.

Poaching, as opposed to legal trophy hunting, is indiscriminate, without regard to age, sex or species of animals killed. There is no respect for boundaries or numbers of animals harvested and if not constantly policed there WILL be no wildlife left. The general modus operandi of the poachers in this region is hunting with homemade gin traps or snares which is very cruel. When RSS initially arrived in Coutada 9 almost every animal harvested by hunters was missing a foot from these traps.

Basically, the animal once trapped will drag the trap around for 3 -4 days until the poachers catch up to it and kill it with an axe or spear. Some species such as lion, buffalo, leopard and elephant that they cannot kill due to the danger aspect with their axes are left to drag these traps around for weeks until the animal dies either from starvation or from infection. Sometimes the animal's foot rots, breaks or is bitten off. These survivors are then crippled for life, or slowly lose condition and die.

One male lion had three of its four limbs injured from traps. Thanks to hunter supported anti-poaching efforts there are far fewer cases of injured animals but still a massive and continual problem.

An eland with a trap on that escaped the poachers with two axes embedded in it and a baby elephant that had to be put down after dragging this trap for over a week.

A buffalo cow that was caught in a trap that was put down after a week and one of several elephant poached annually for their ivory.

A mature lioness and a sub adult lioness that both died from these traps.

A young male lion that was caught with a trap, after a week it's foot rotted off and is now walking around with only 3 feet.

The illegal cutting of hardwoods for planking is another massive problem and the RSS anti-poaching team is heavily involved in trying to protect all the beautiful hardwoods on Coutada 9.

The only donations received to date have been from the hunting organisations, Dallas Safari Club and Safari Club International. RSS would like to thank them both for helping us save the animals and habitat on Coutada 9.

A massive THANK YOU to all the hunters who in following their passion for adventure in wild Africa. Have saved thousands of animals in Coutada 9, provided employment and income for many families as well as fed thousands of local villagers over the past 13 years. None of the animals pictured here have names but hunters are the ONLY ones fighting to save these remote and wonderful areas and their wildlife. Your continued support of sustainable hunting is greatly appreciated.

Pictured above is 1306 gin traps, 68 cable snares, 9 can rat traps and 25 homemade muzzle loaders that were collected by our RSS anti-poaching team in 2015 alone. This anti-poaching effort alone costs RSS over US$100 000 annually, all of this comes from sustainable hunting.

RCVD FEB 27 2018

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

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Morris	Brandon	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	[illegible] as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Shreveport	LA	(b) (6)		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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17453298BC/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): 02/15/2018

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 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:

      Zimbabwe Property name: Senuko 2 Hunting company: Senuka Ranching LTK
      GPS S 20 38 386 E 032 38 386

   b. Date wildlife is to be hunted:

      May 25th to June 14th of 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

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: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
Address:
City Belmont
State/Province: Bulawayo
Country, Postal Code: Zimbabwe

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: 2-15-18

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).

Houston, TX

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):

Same as page 1

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):

Darbi Rice (b) (6) [redacted]

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.

RCVD FEB 27 2018

DOCUMENT IS PRINTED ON CHEMICALLY REACTIVE PAPER - THE BACK OF THIS DOCUMENT INCLUDES A TAMPER EVIDENT CHEMICAL WASH WARNING BOX

THE BACK OF THIS DOCUMENT INCLUDES MICROPRINTED ENDORSEMENT LINES

(b) (6) [redacted]

(b) (6) [redacted]

CITIZENS NATIONAL BANK
Bossier City, Louisiana 71171-6266

84-352/1111

2/16/2018

PAY TO THE ORDER OF U.S. Fish and Wildlife Services $ **100.00

One Hundred and 00/100********** DOLLARS

U.S. Fish and Wildlife Services

VOID AFTER 120 DAYS

AUTHORIZED SIGNATURE

MEMO Brandon T. Morris lion permit application

(b) (6) [redacted]

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

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

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, 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: Stephen Knight

Name: (b) (6) Stephen Knight

Date: 2/18/18

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

Federal Fish and Wildlife Permit Application Form

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

MAR 15 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Wright	John	Stephen	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)		(b) (6)	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Amarillo	TX	(b) (6)		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: un known 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): 2/18/18

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:

      Tanzania, likely Rungwa Mpera

   b. Date wildlife is to be hunted:

      August 2019

   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

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:	Rungwa Game Safaris/Tanzania Bundu Safaris
Business Name:	1-Sable Village
Address:	Kisongo,Arusha
Address:	Tanzania
City:	
State/Province:	
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.

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: Stuart Knight Date: 2/18/18

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):

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.

(b) (6) [redacted]

(b) (6) [redacted]

DATE 2-15 20 18

PAY TO THE ORDER OF US Fish + Wildlife $ 100.00

One hundred & NO/100 DOLLARS

HAPPY STATE BANK AND TRUST COMPANY

FOR (b) (6) [redacted]

Steven Wright

WHIT-CO C

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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, 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Sullivan	Julian	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Madison	Alabama	(b) (6)		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 ☑ 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.

LLL

Signature (~~in blue ink~~) of applicant/person responsible for permit (No photocopied or stamped signatures)

20-Feb 2018

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 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

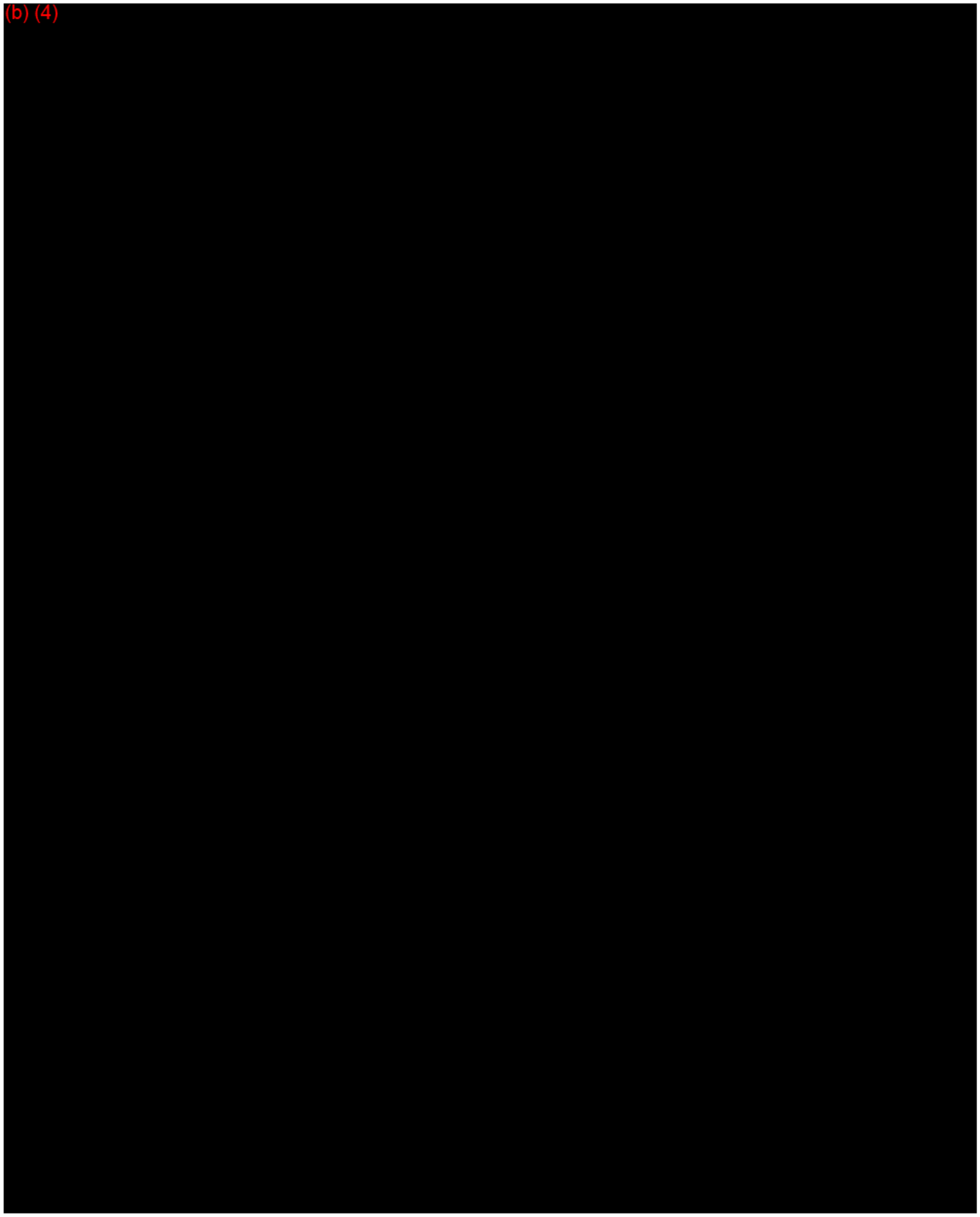
12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless 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?

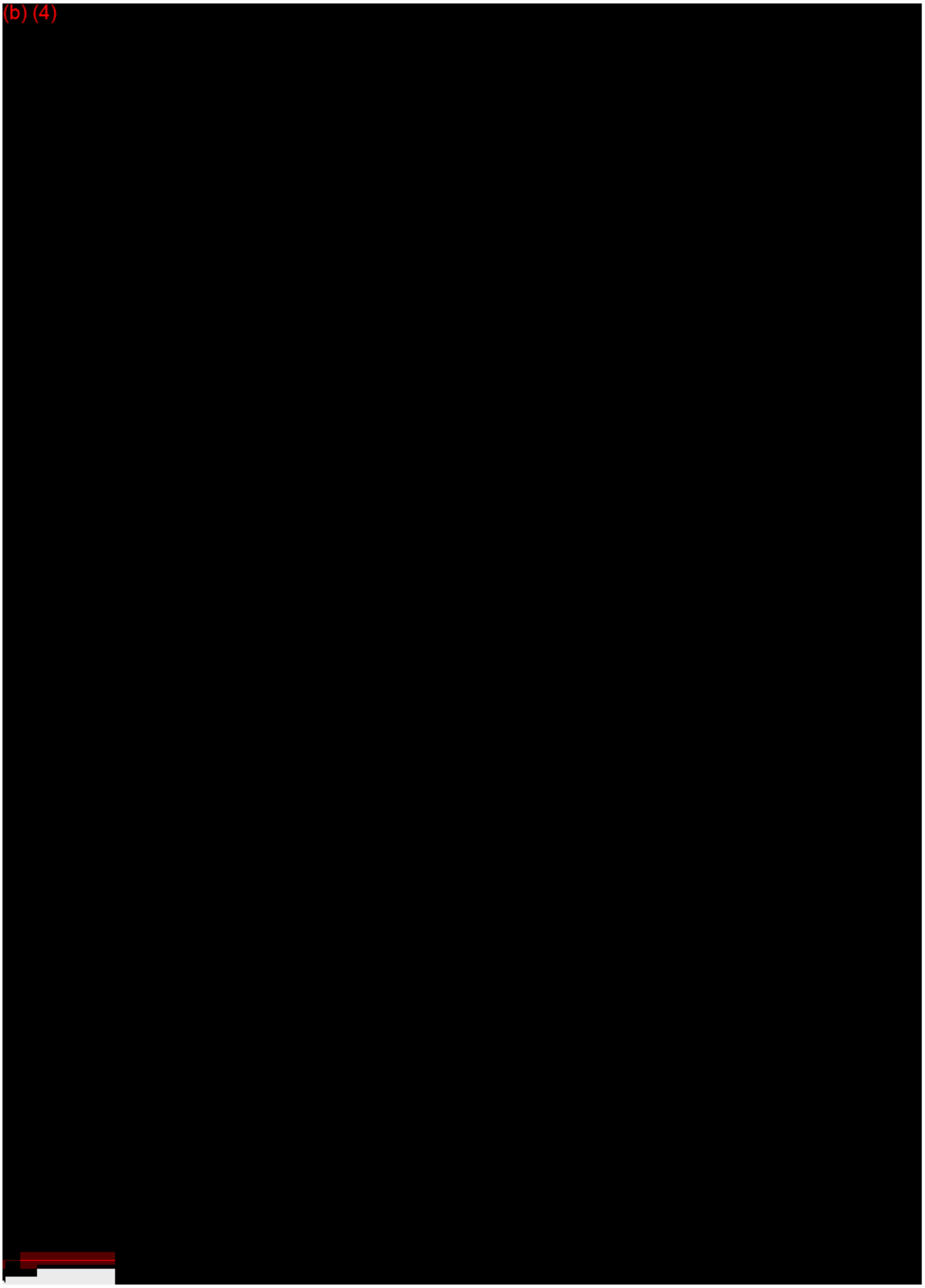
☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

PRIVILEGED, PROPRIETARY, CONFIDENTIAL INFORMATION

NOT FOR PUBLIC RELEASE

(b) (4)

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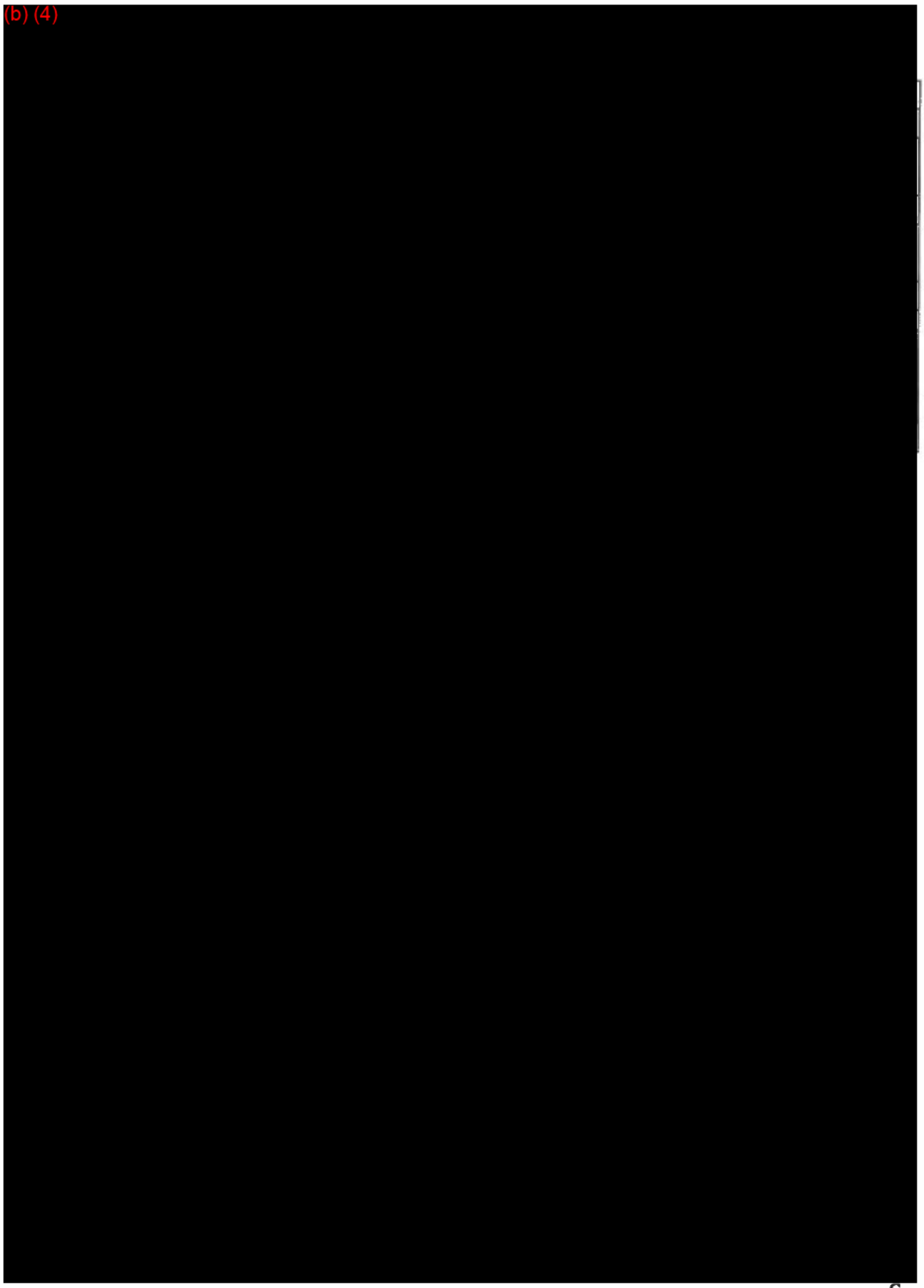
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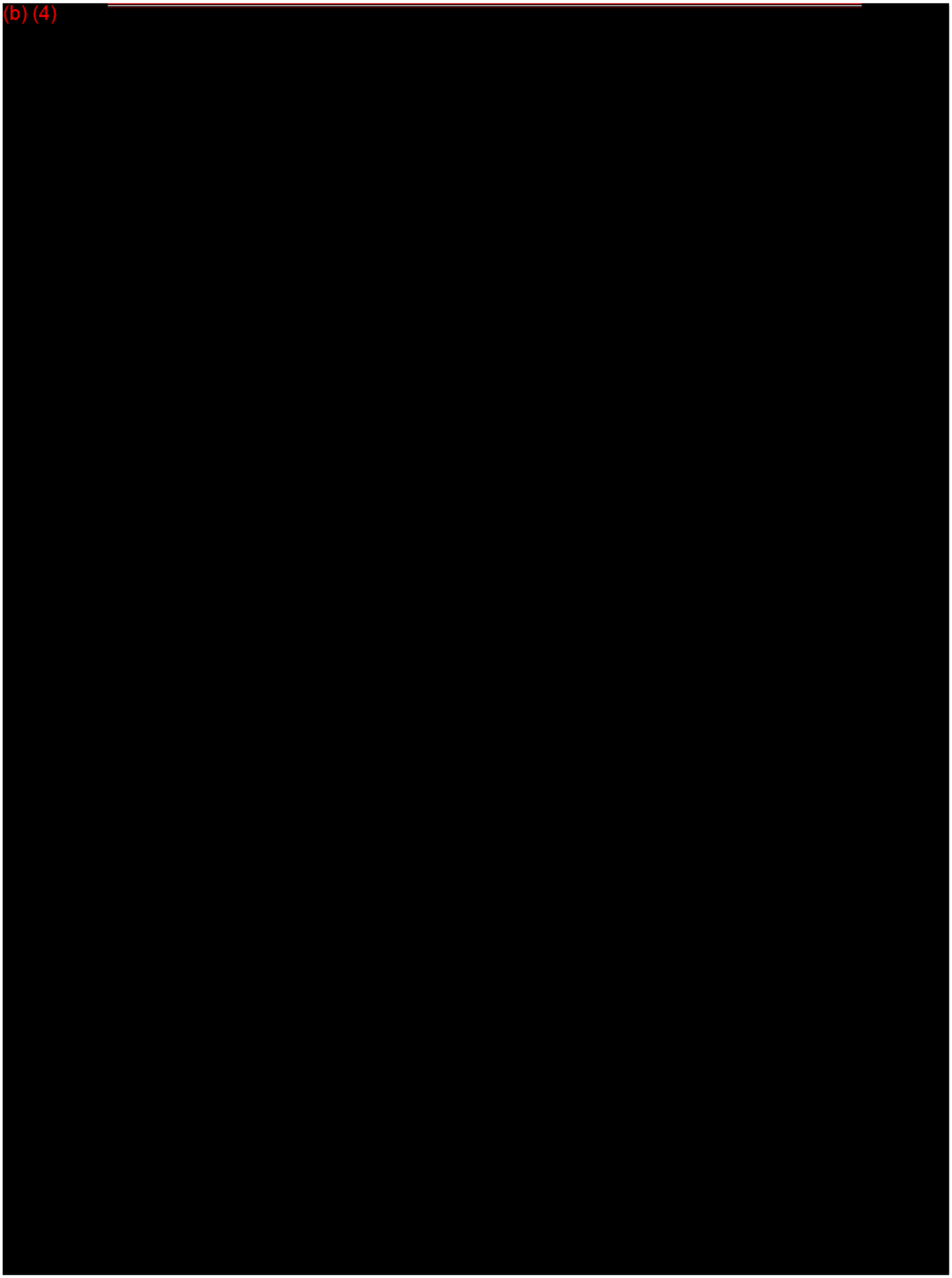

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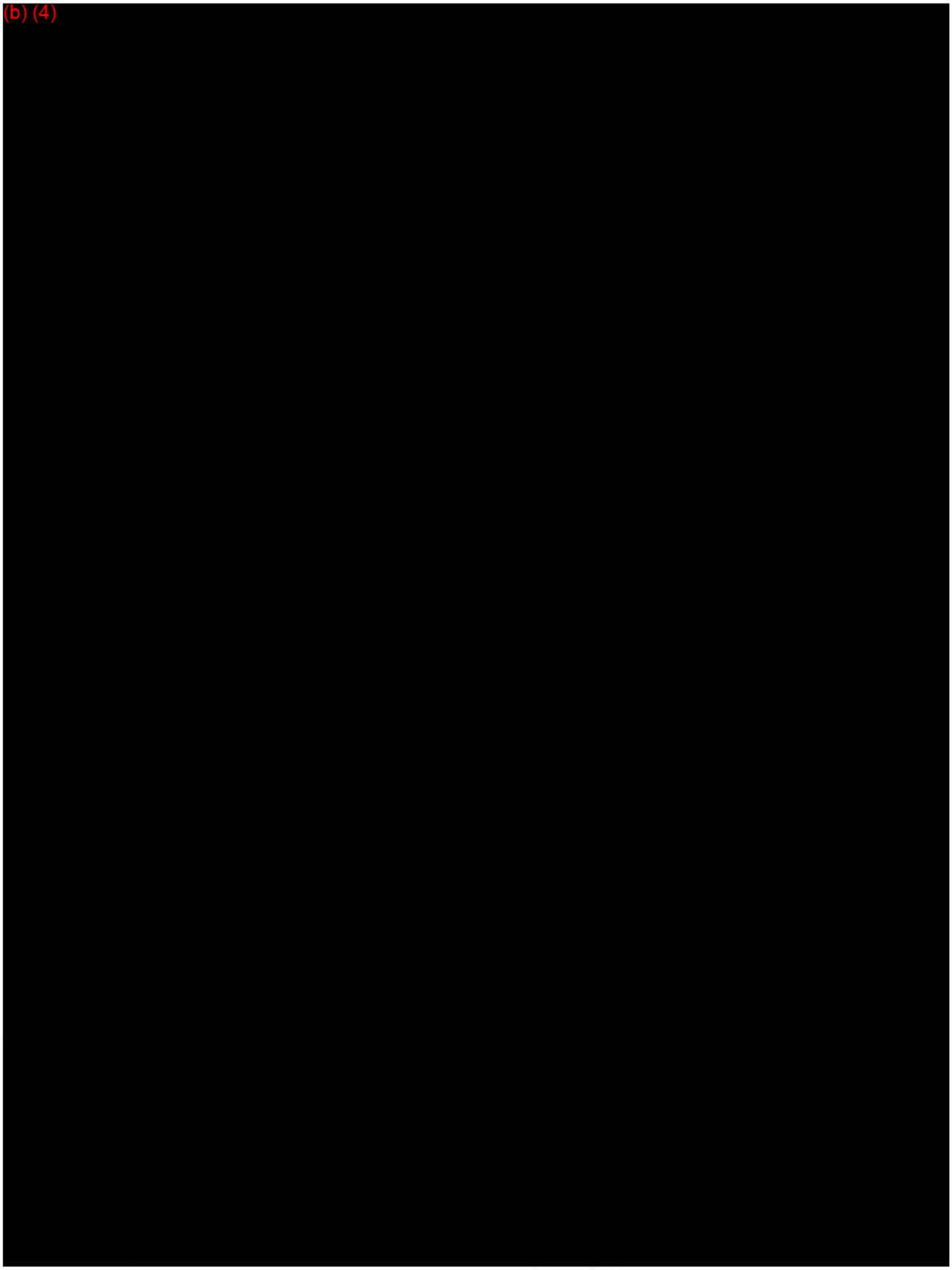

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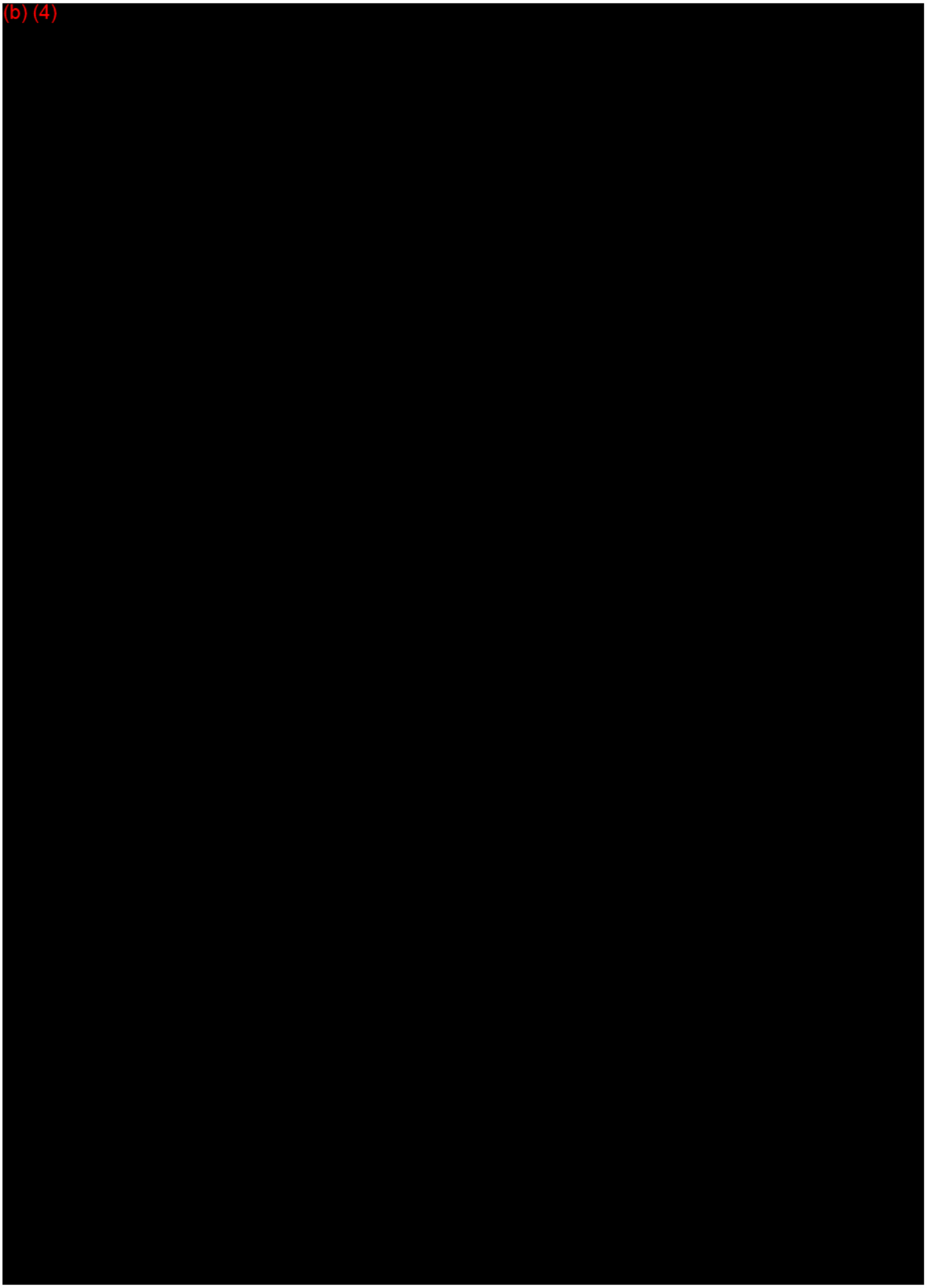

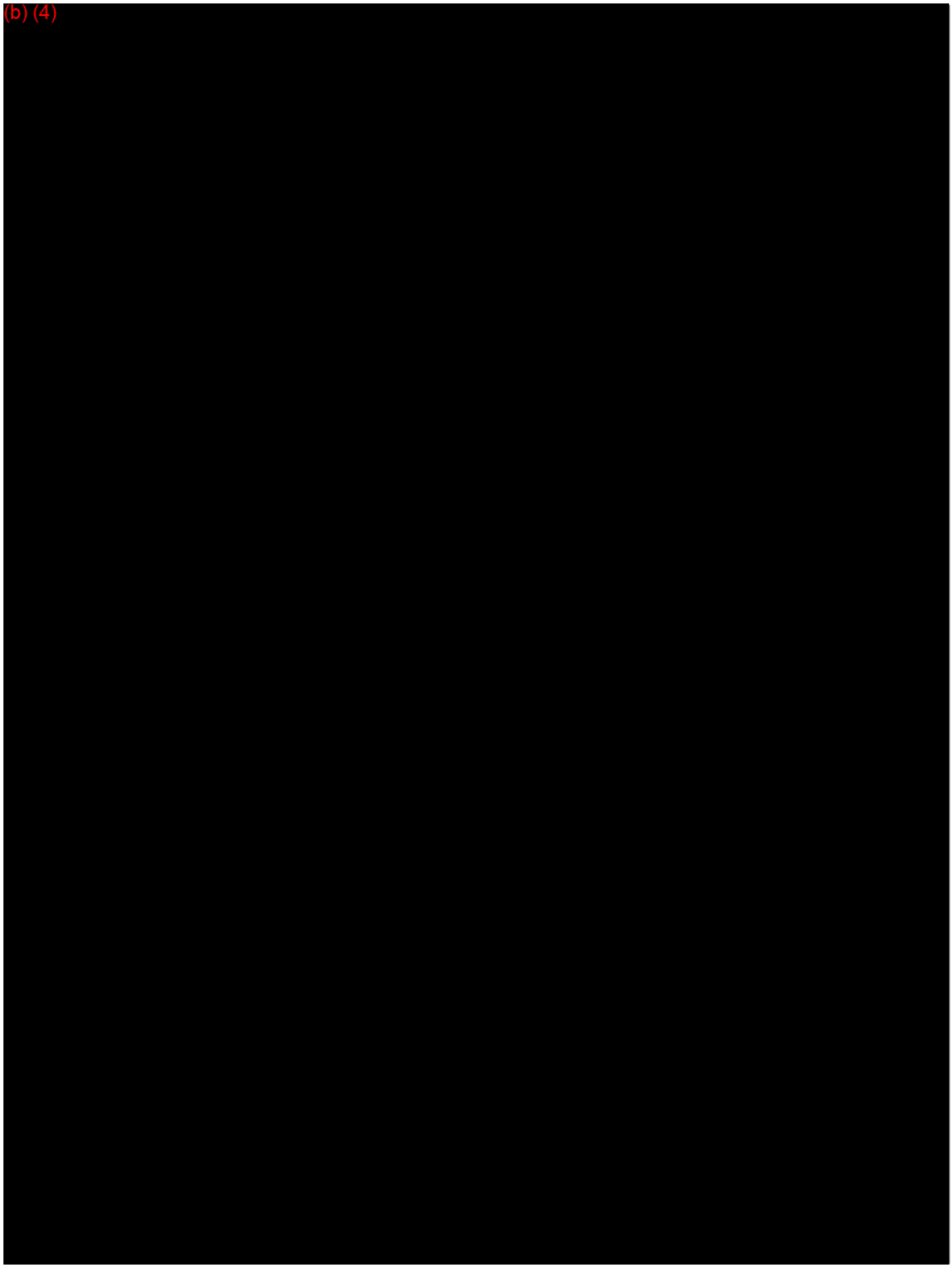
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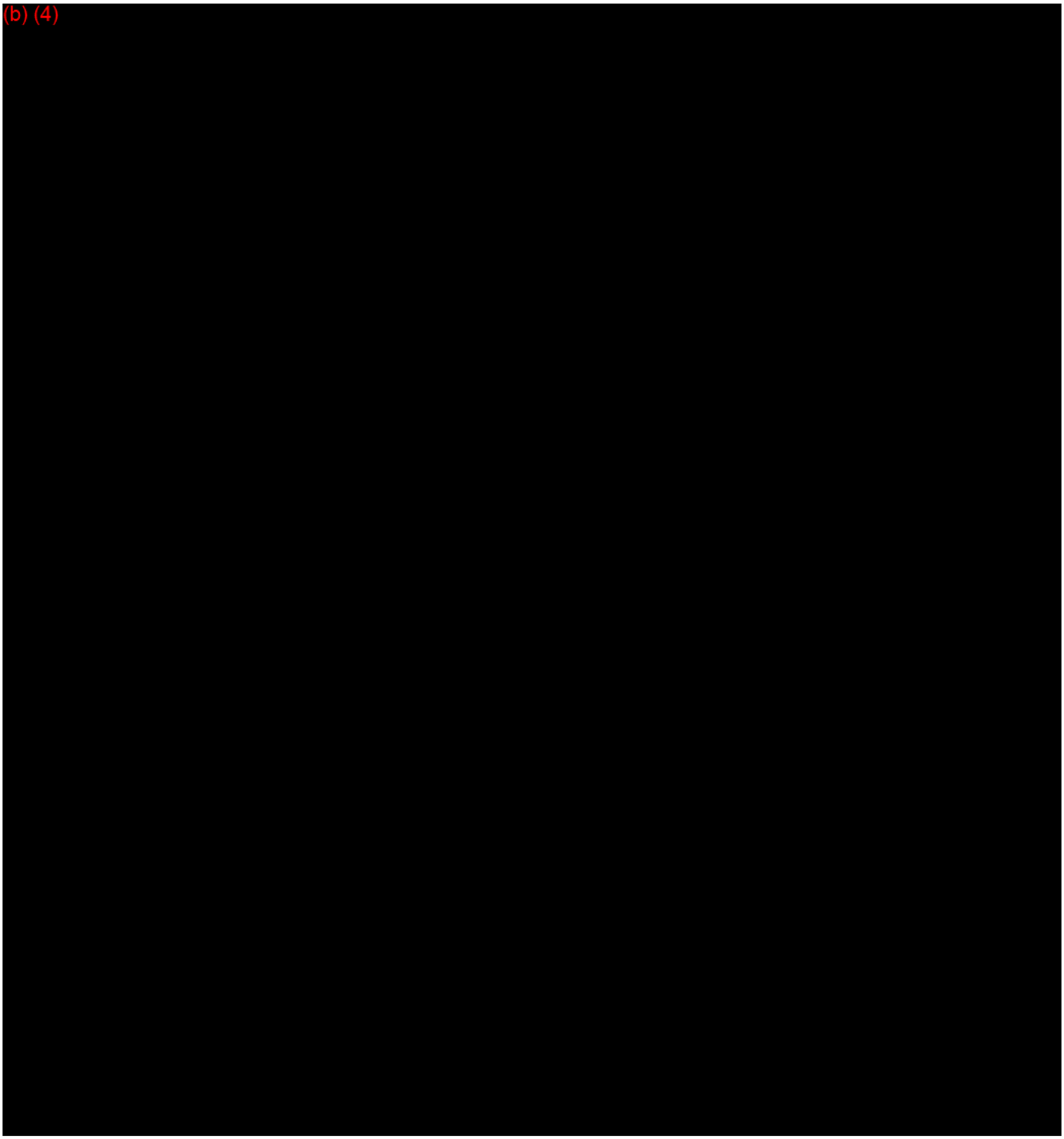

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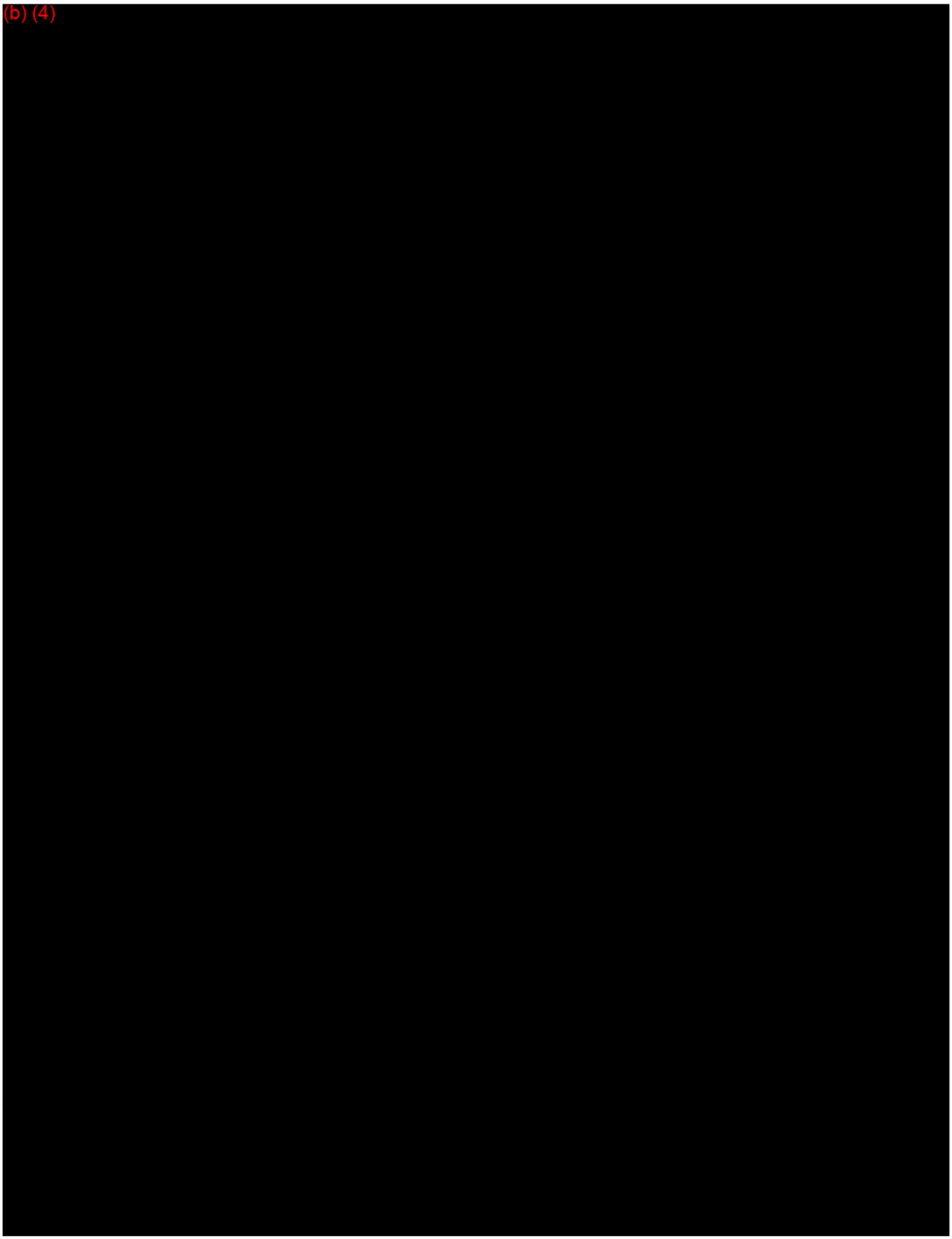
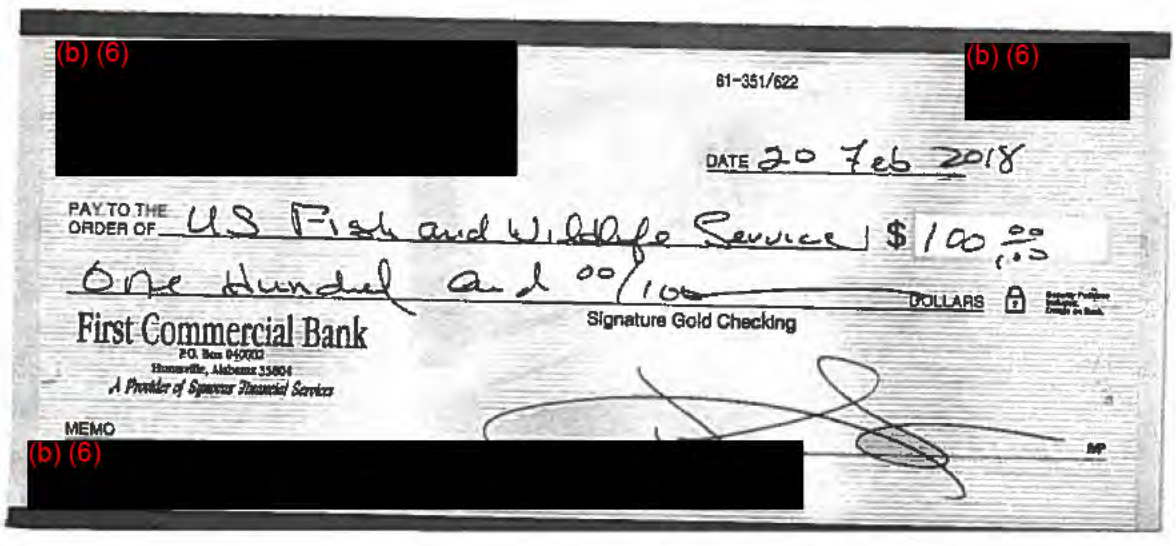


(b) (4)

(b) (4)

MAR 15 2018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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

MAR 2 3 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LIMMER	SCOTT	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAPORTE	COLORADO	(b) (6)		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) [redacted]

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)

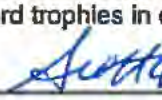
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

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:  Date: 03/12/2018

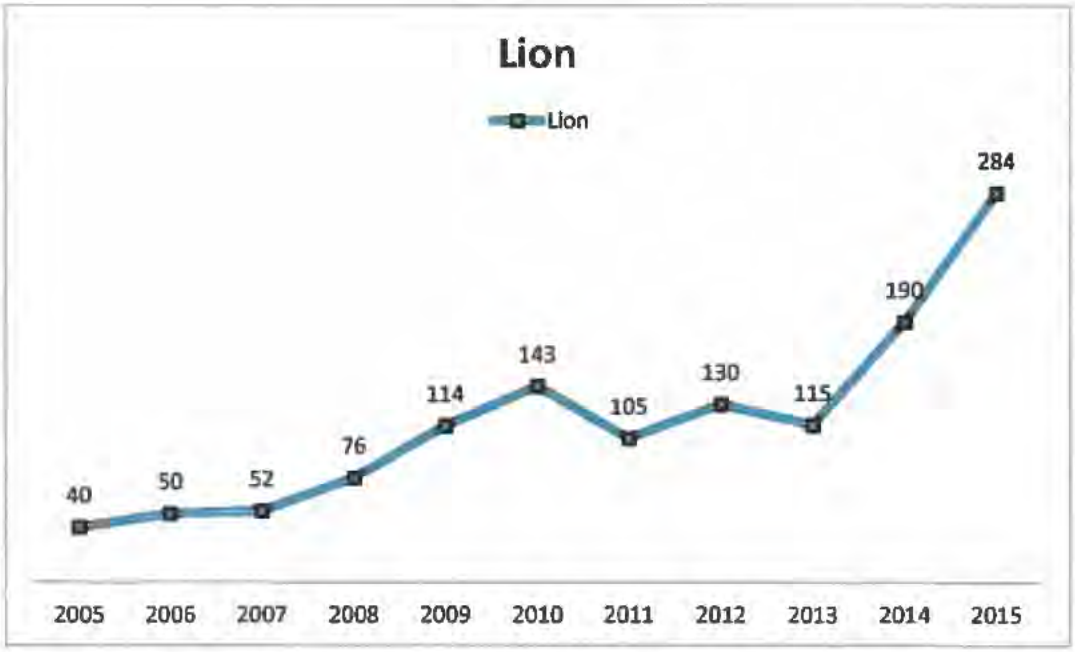
Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain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



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

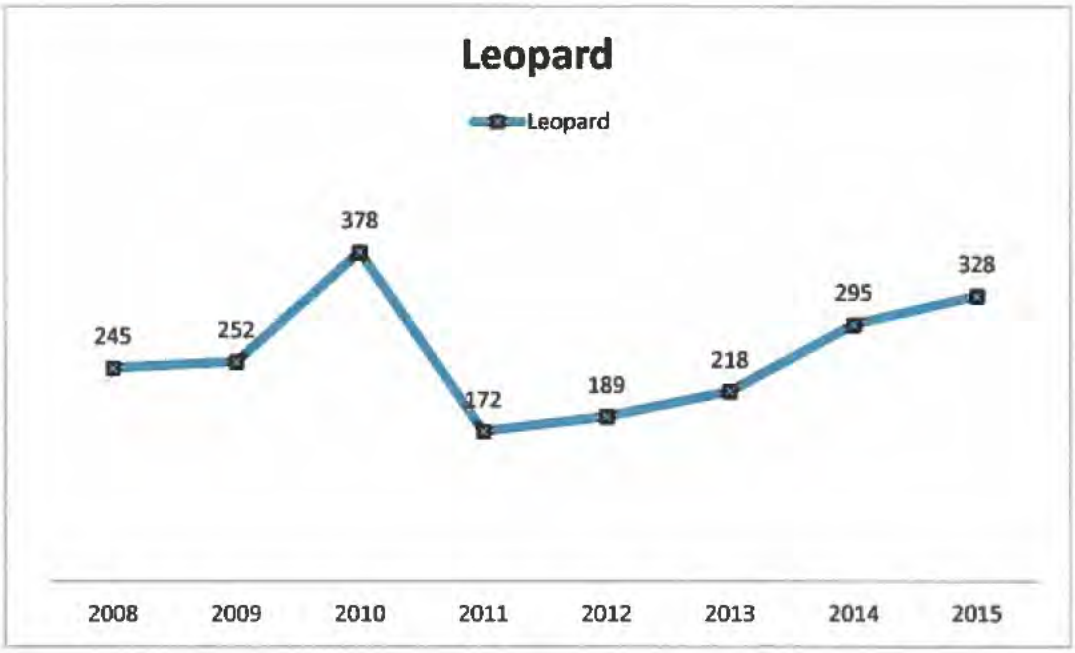
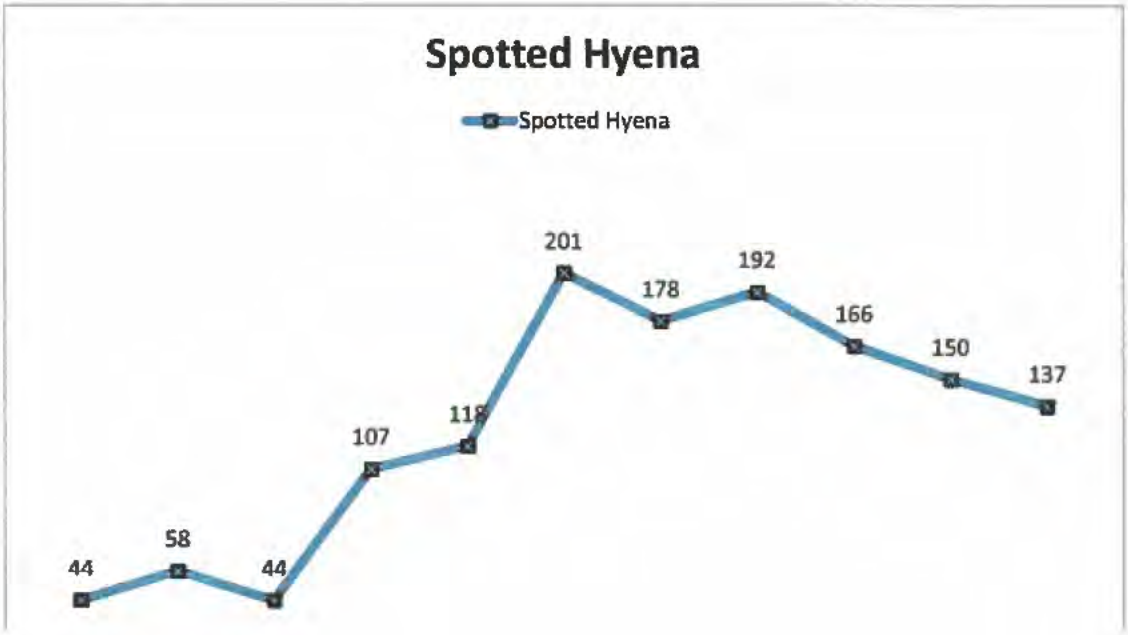


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.



See page #3.

For 9a.

African Wildlife Conservation Fund

Savé Valley CONSERVANCY

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 6-7km^2 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.

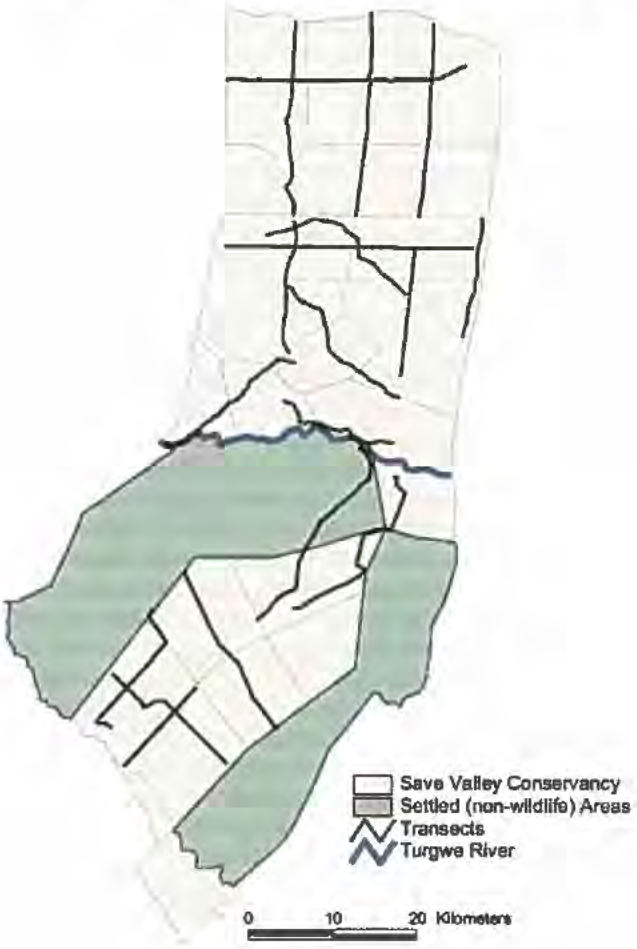
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

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

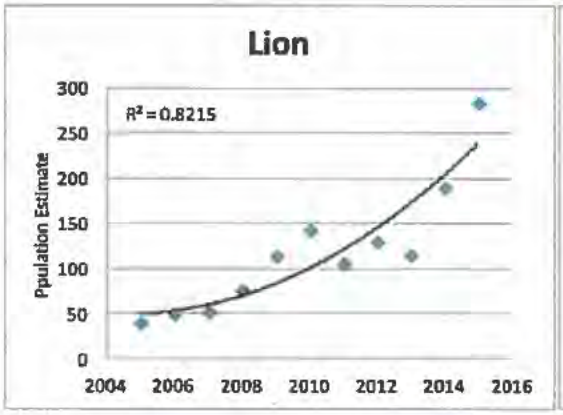
Table 1: Summary of survey parameters (2015)

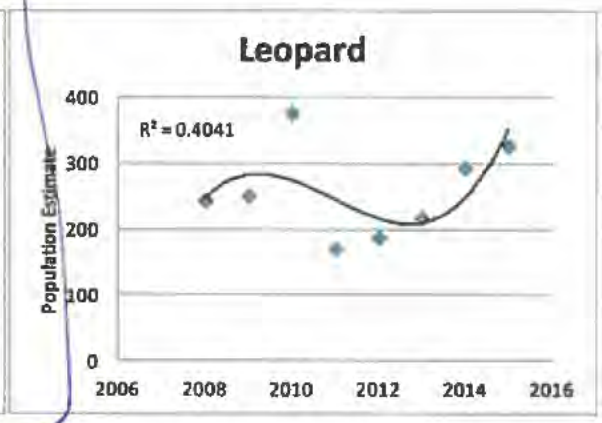
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	258.6	131.3	389.9
Penetration ratio	6.34	6.09	6.26

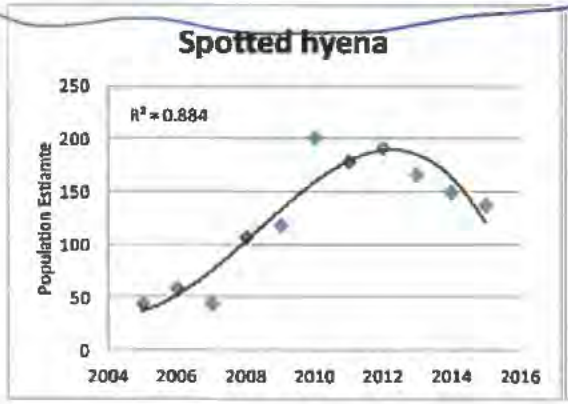
Comparison with previous years

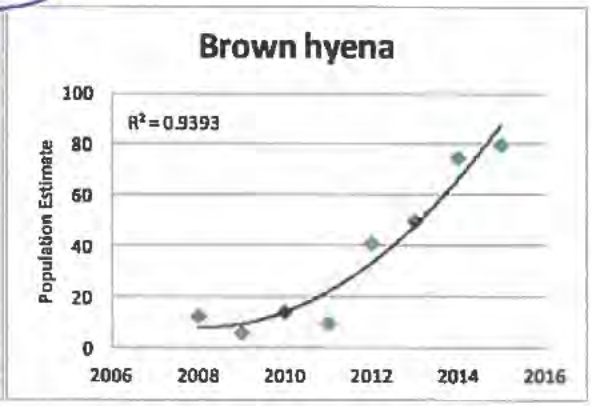
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2015 (from 2005 – 2015 for lion and spotted hyena). Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld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









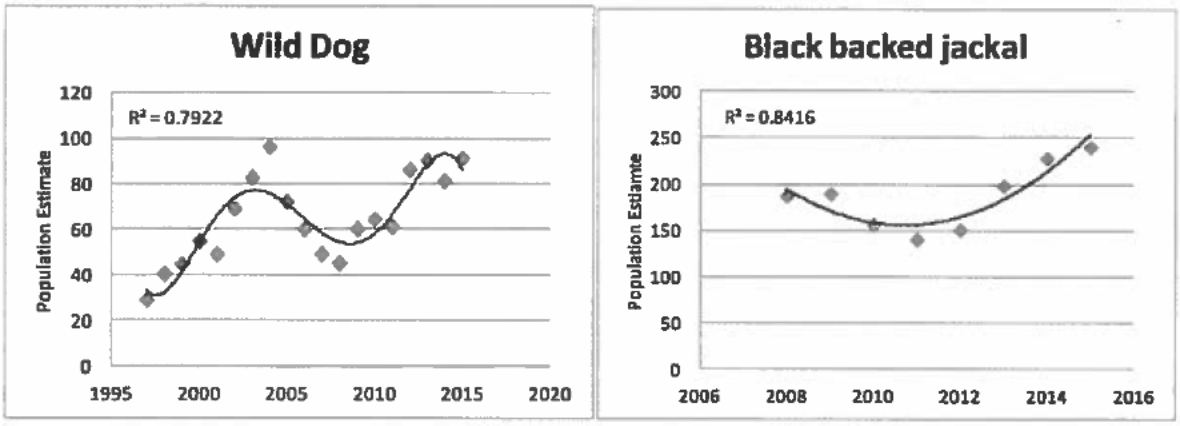


Figure 3: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts. *A breakdown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

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Acknowledgements

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

NORTH SVC Species	Survey Area North 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	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 Species	Survey Area South 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	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

IUCN April 2016 Briefing Paper

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.).

Attached for 9a.

The 323,000-ha Bubye 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. Leathem, pers. comm.).

The Cawston Game Ranch in Zimbabwe, at 12,600 ha, is much smaller than SVC and Bubye, 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 Hyaenas 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).

Image courtesy of Wildscreen Exchange, www.wildscreenexchange.org

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

For 9b.

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

15% 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	15,000.00	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

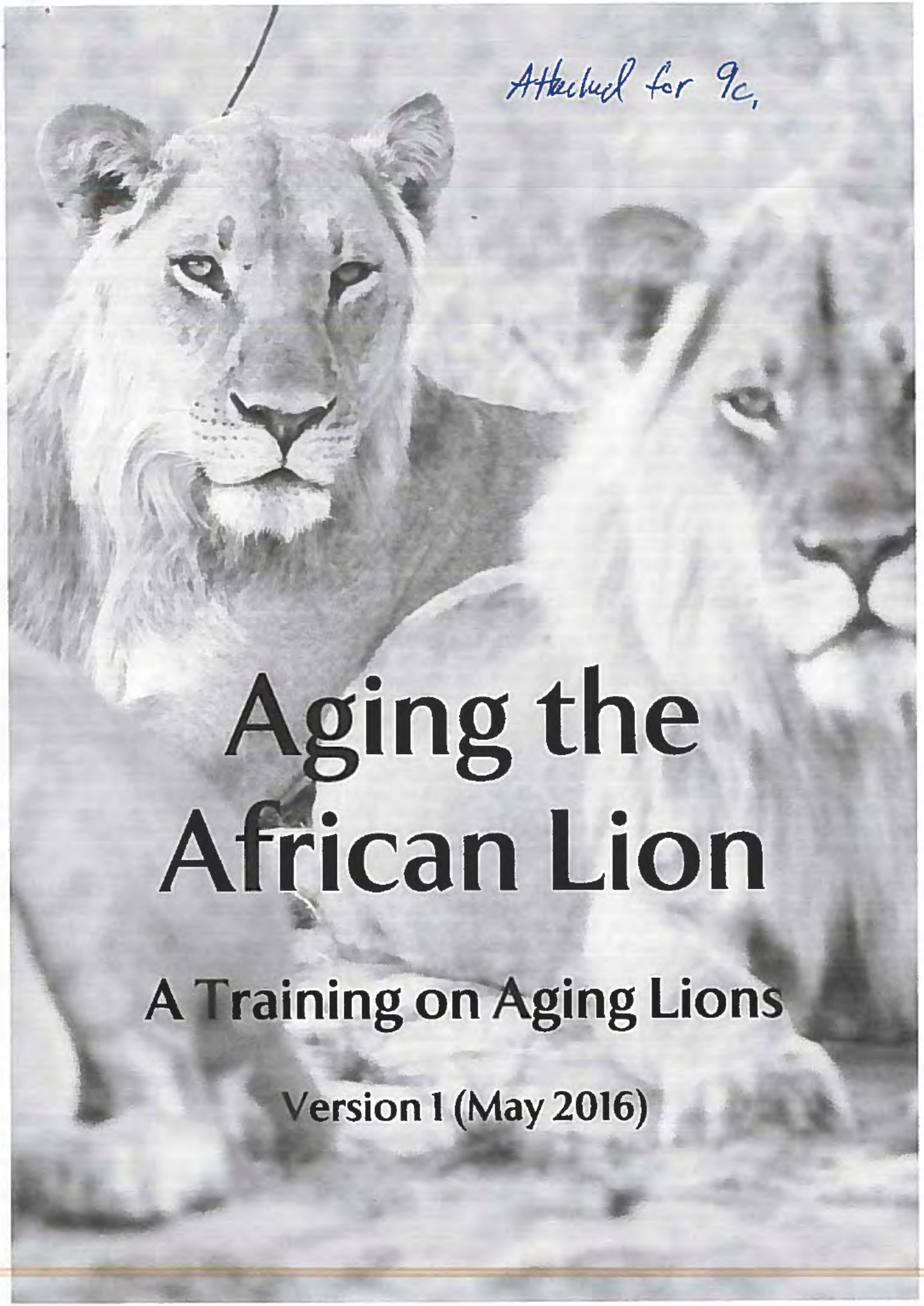
Mokore Safaris' regulated, sustainable-use based hunting program enhances the survival of the lion. Our program helps to preserve and improve available lion habitat. Our anti-poaching program serves to protect and grow the lion's prey base and reduces incidental take of lion by meat poachers. And our 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

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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.

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ONGAVA RESEARCH CENTRE

WILDCRU Wildlife Conservation Research Unit

EWASO LIONS

PANTHERA

Zambian CARNIVORE PROGRAMME

KOPE LION

PROJECTO CARNIVOROS DO NIASSA

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.

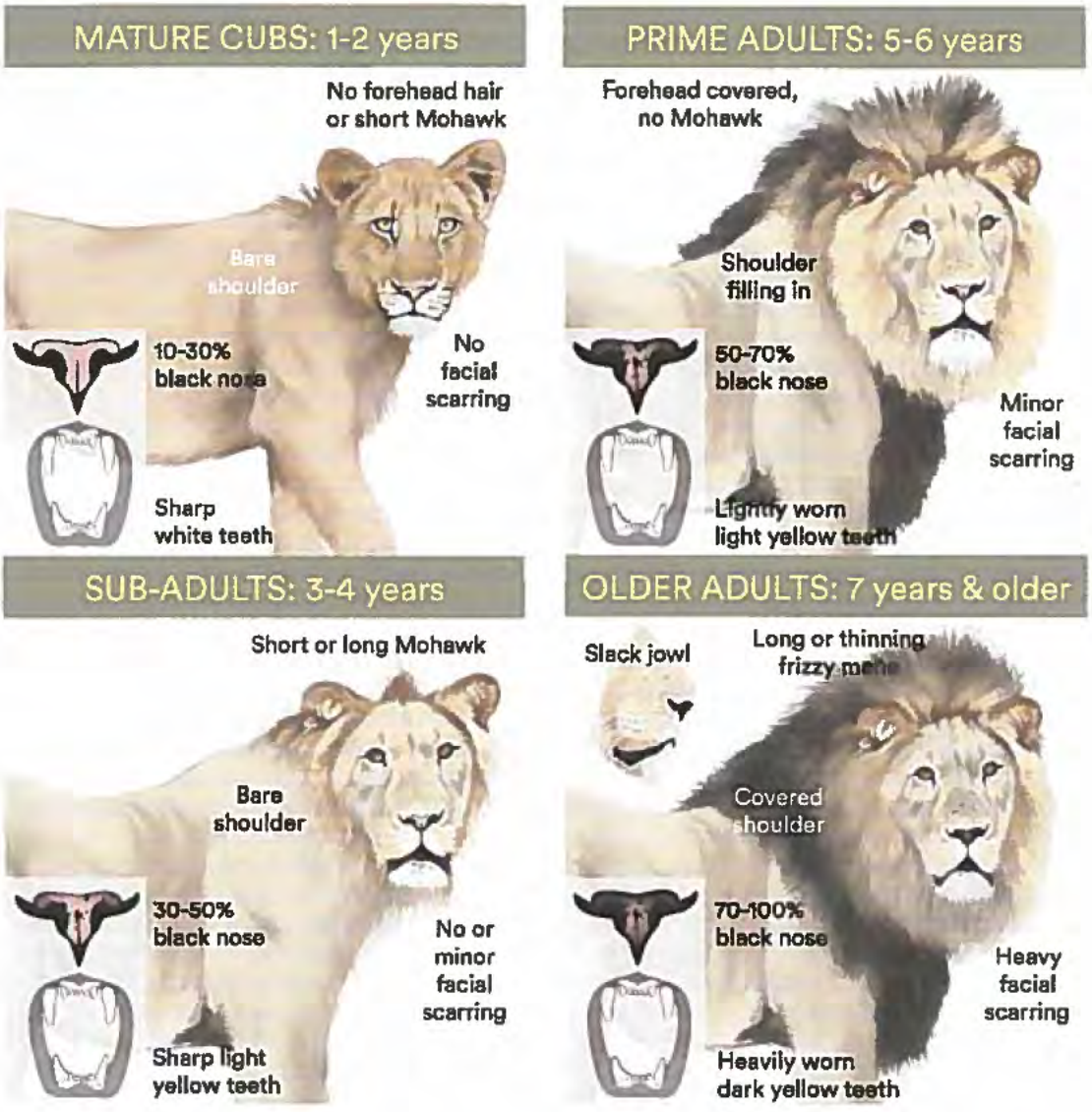
Lion Biology

- 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!

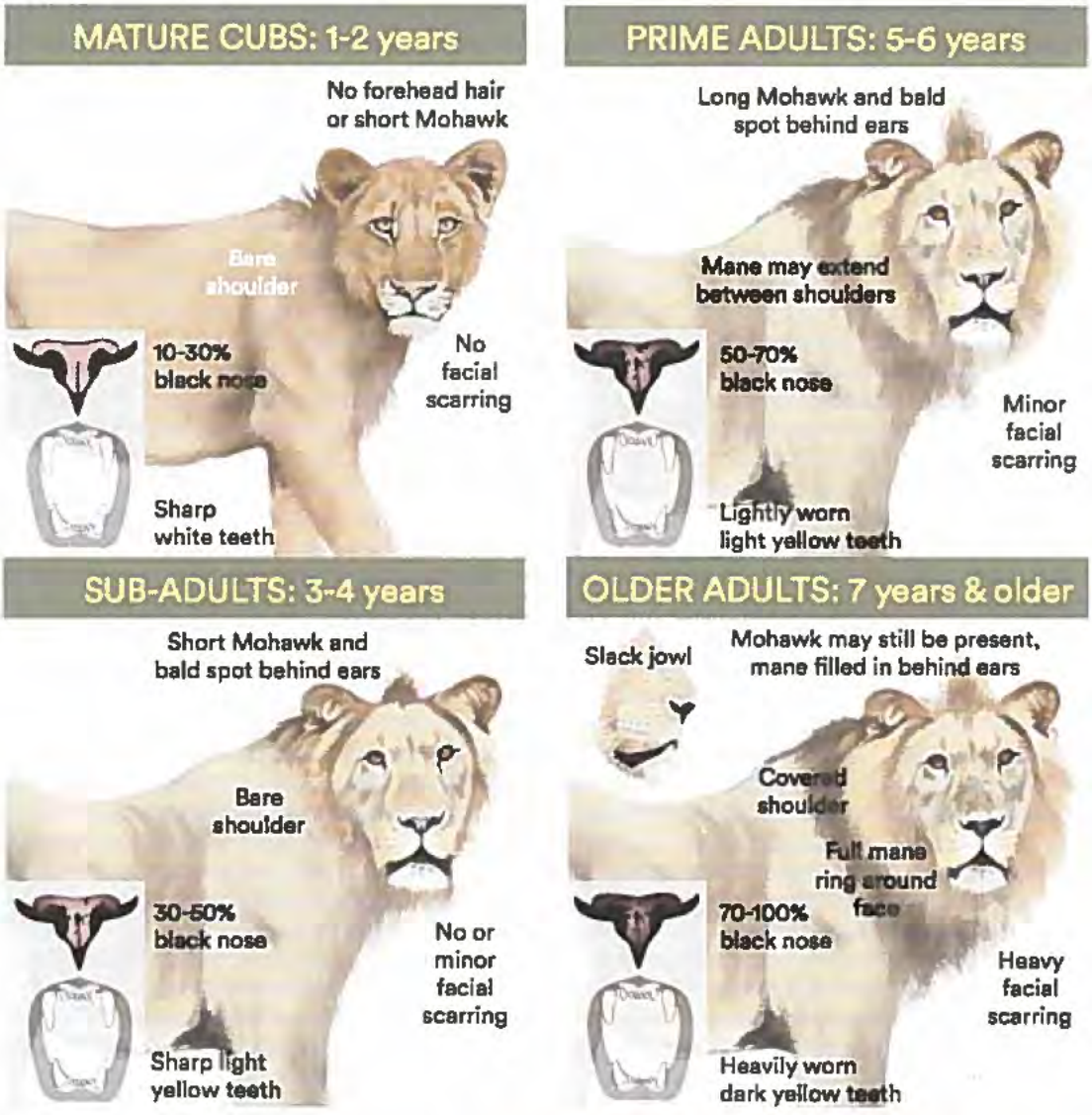
Quick Guide to Southern and High-Lying Africa
(e.g. Hwange in Zimbabwe, Serengeti in Tanzania)



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)



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

Attached for 9c

Mokore Safaris PH Rules See pg #12.

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 skinners 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. 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 THE ORDER OF USFWS
$ 100.00
One Hundred and no
DOLLARS
Heat Reactive Ink
First National Bank
Fort Collins, CO
MEMO Permit Application Fee
(b) (6)

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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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 km^2 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

RCVD MAR 27 2018

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: [signature]

Name: David (b) (6) Turner

Date: 3/13/2018

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

O.M.B. No. 1018-0093
Expires 05/31/2017

RCVD MAR 27 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Turner	David	W	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Middleton	Idaho	(b) (6)		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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 08US188472/9 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): 3-12-2018

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, 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) [redacted]

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

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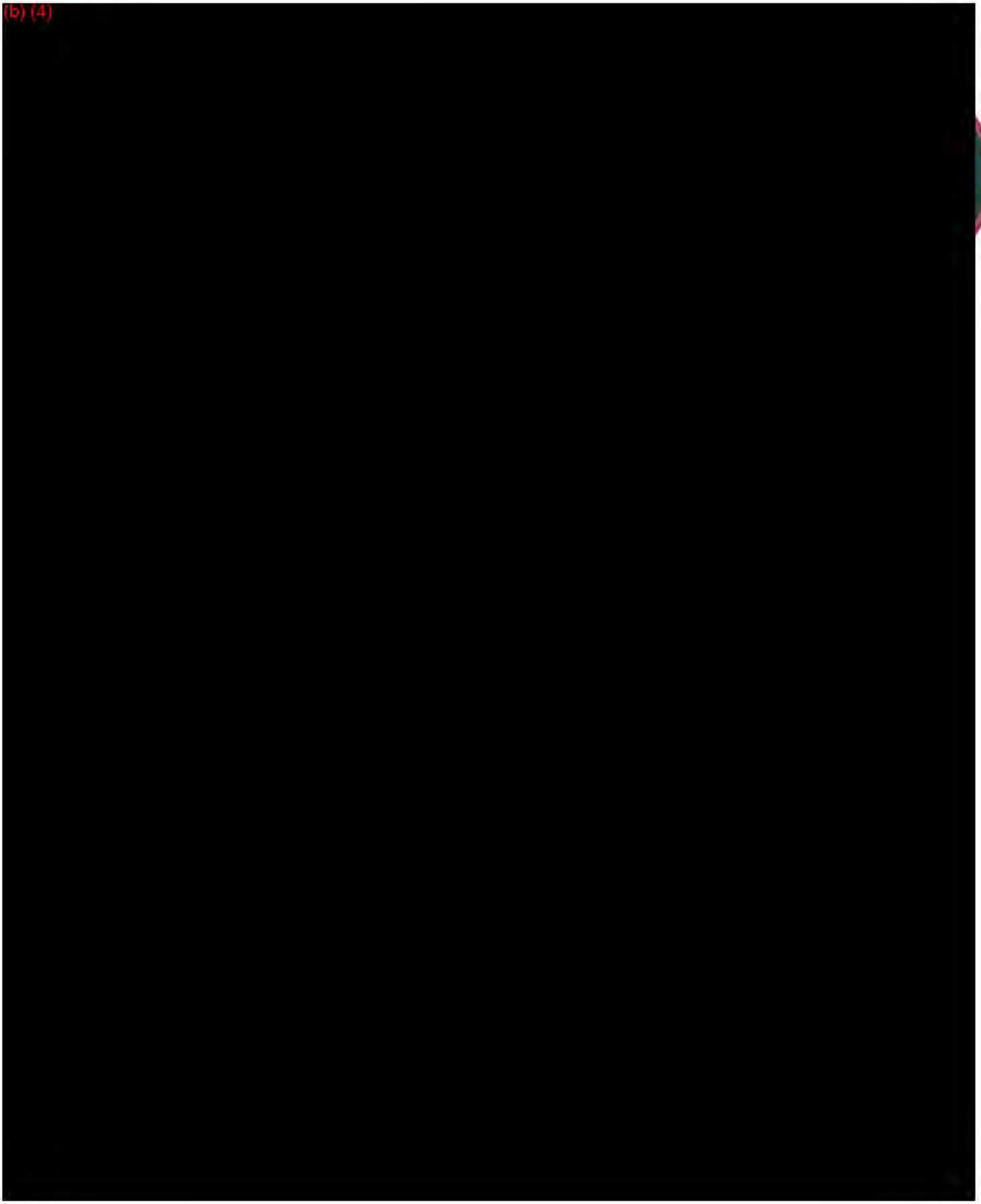

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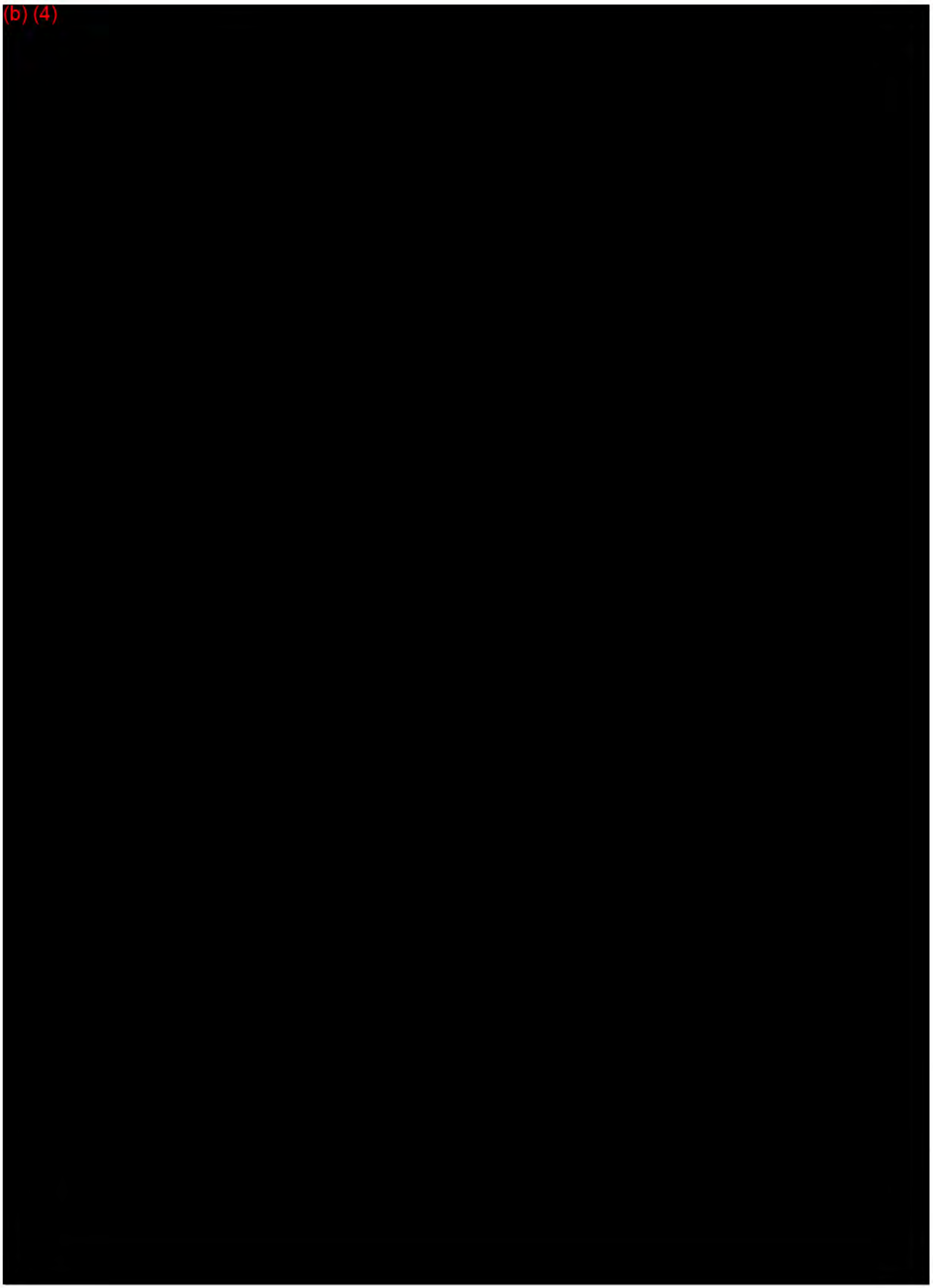

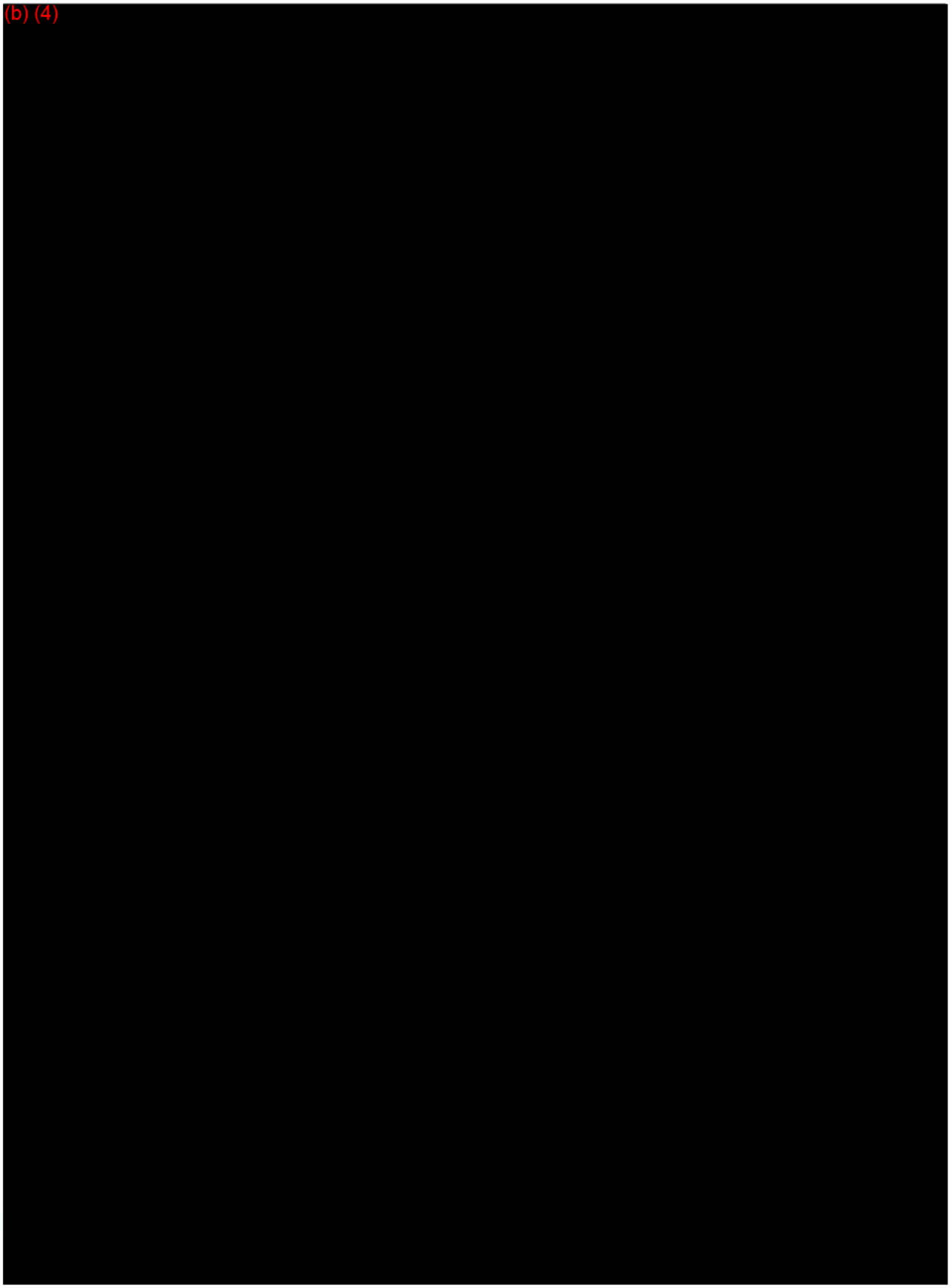
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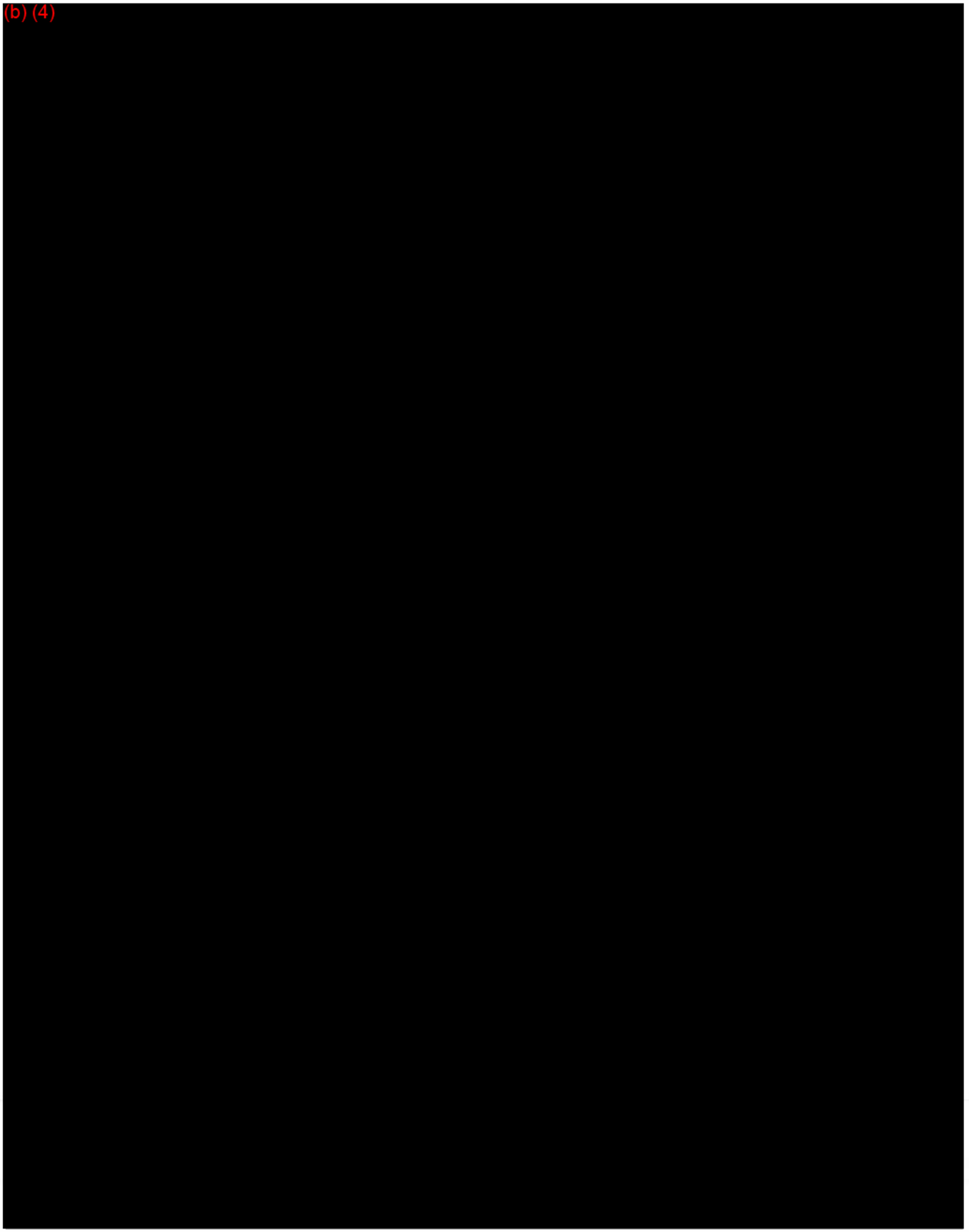

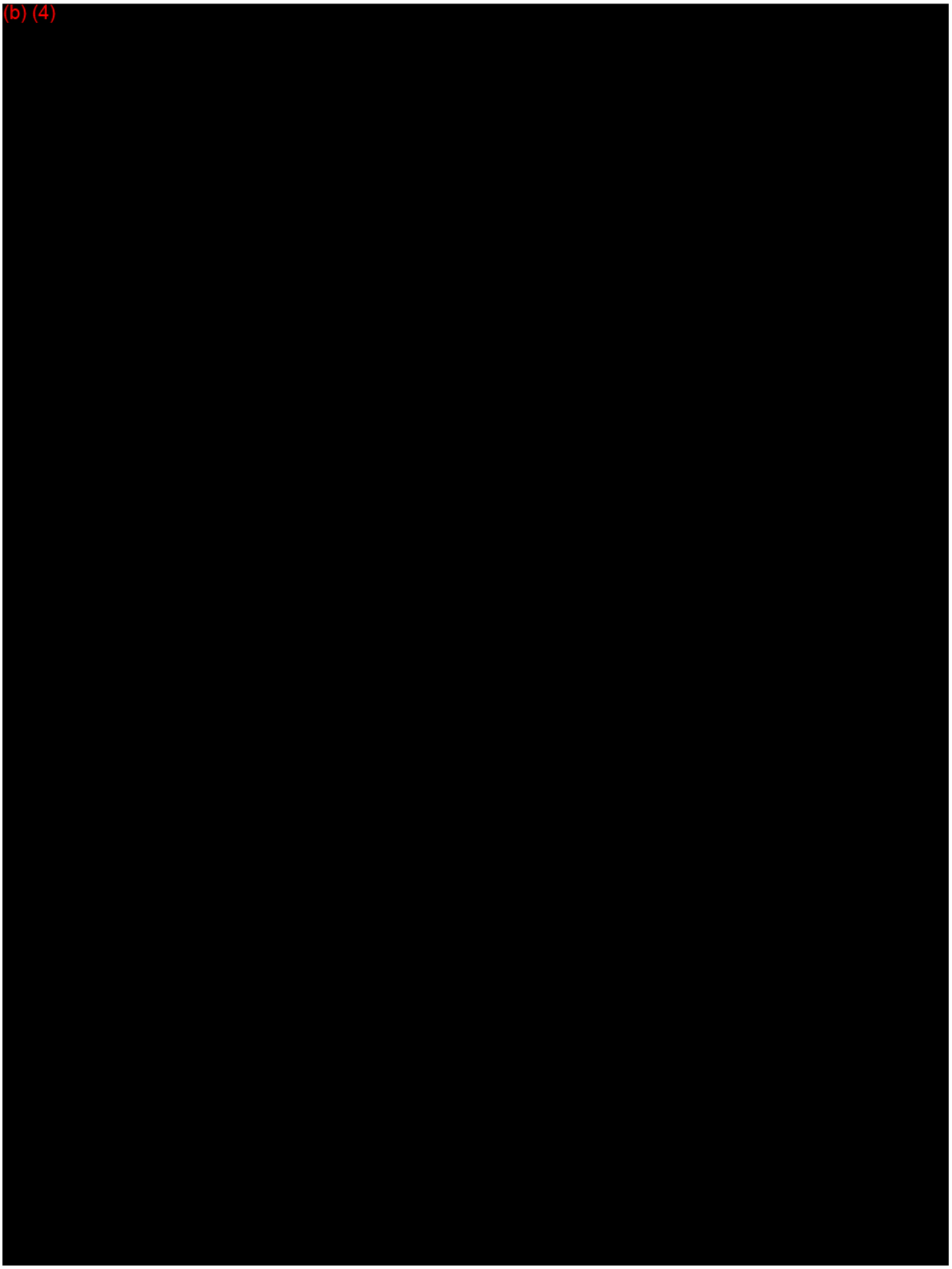
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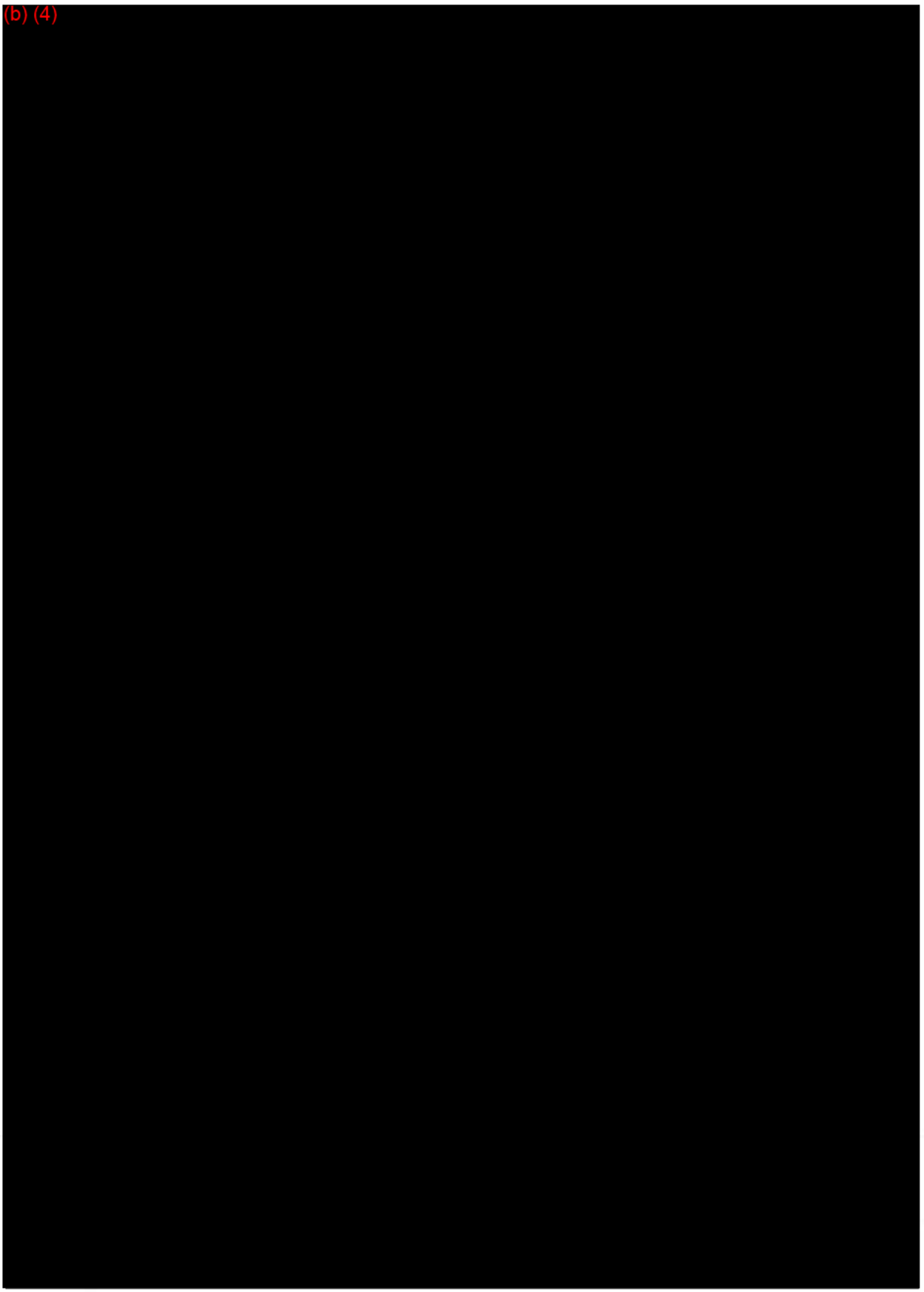

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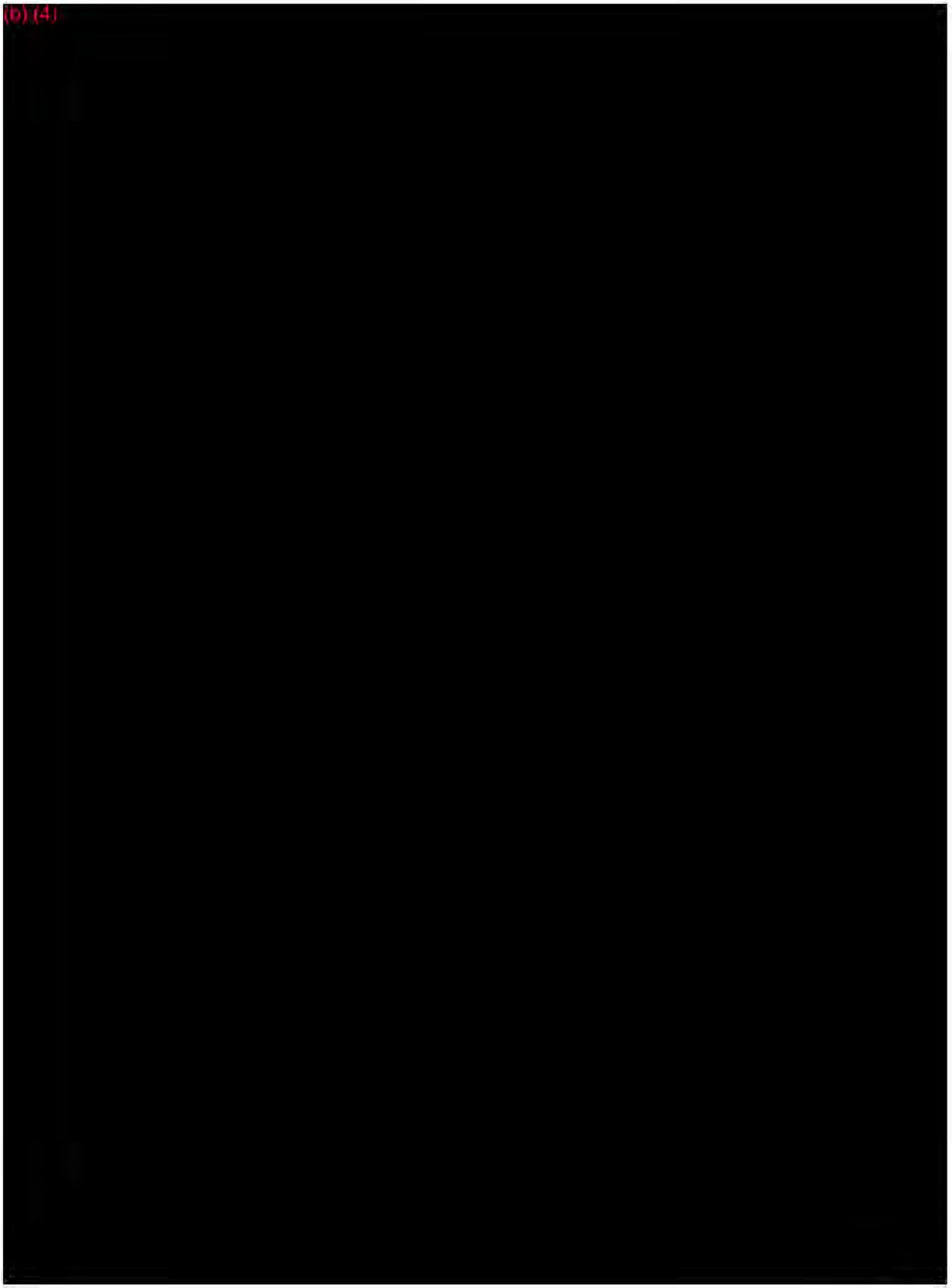

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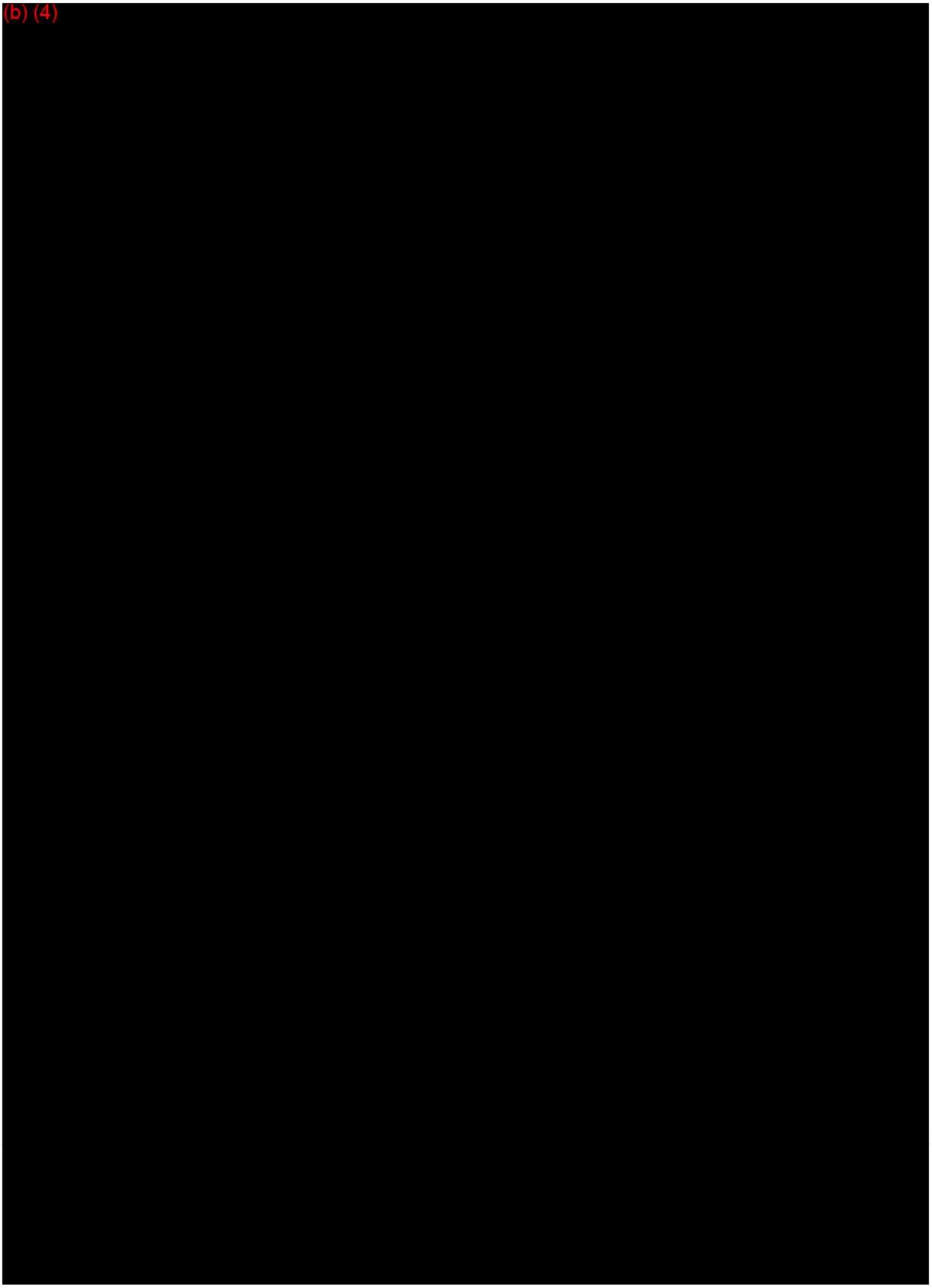

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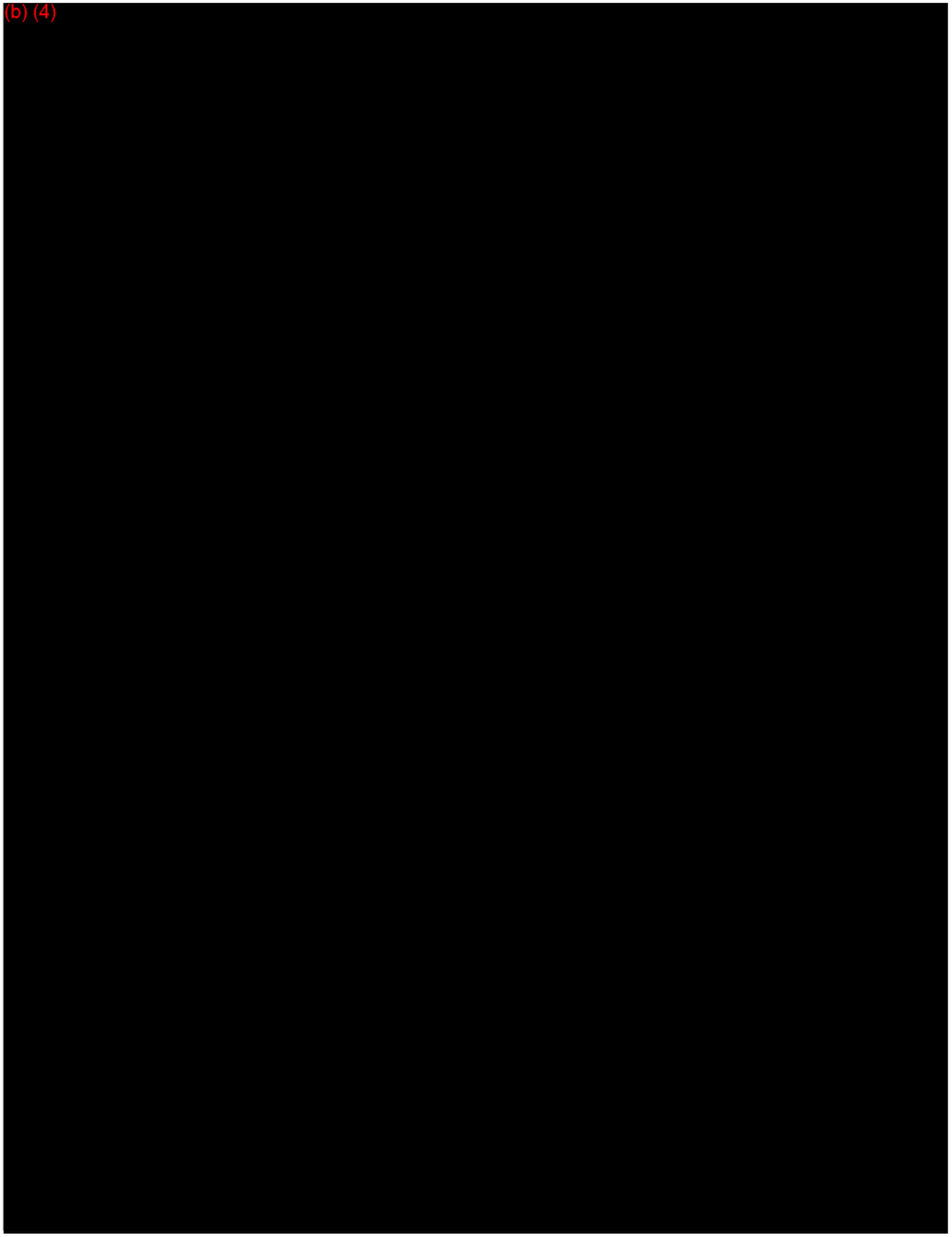

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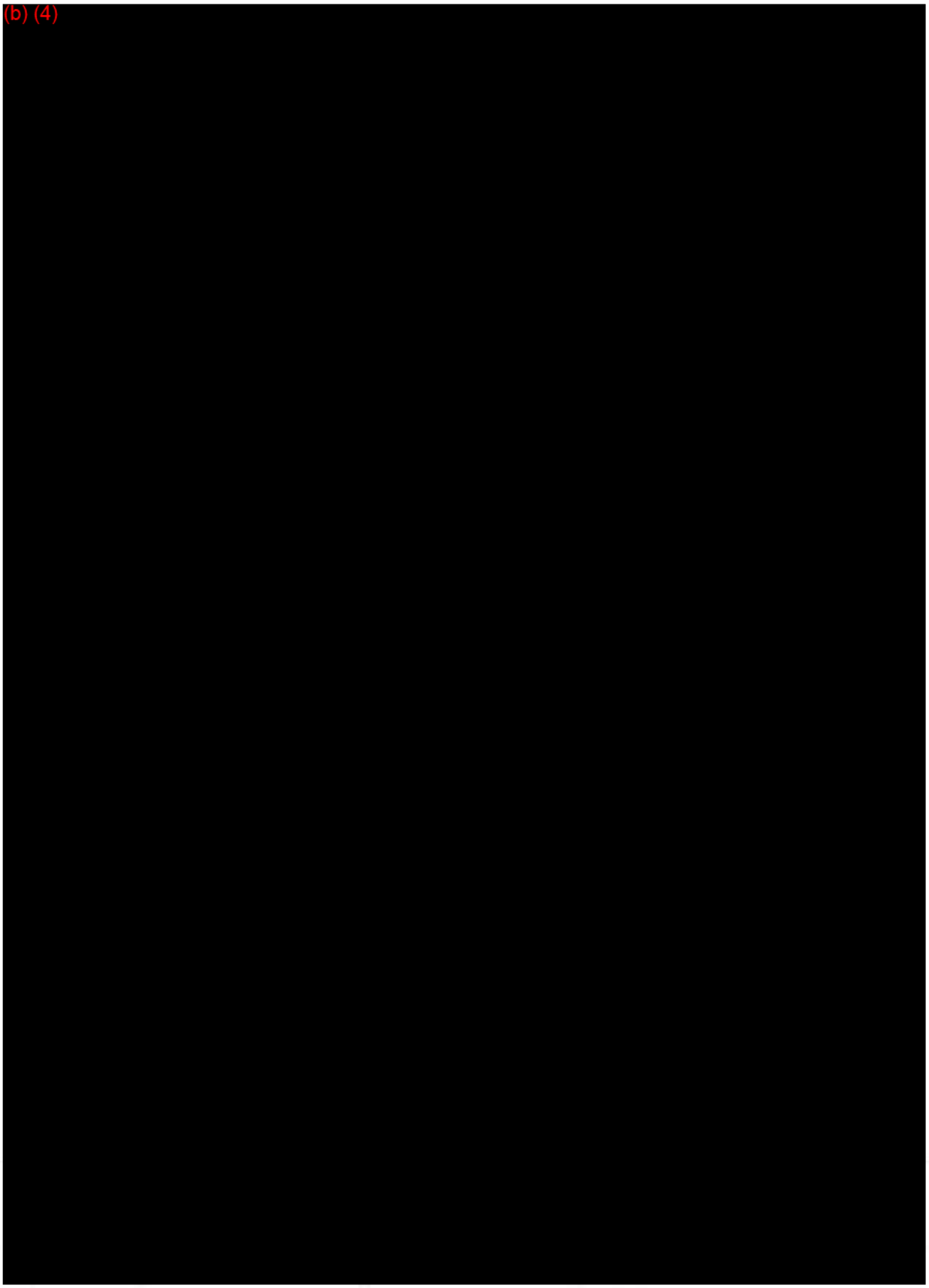

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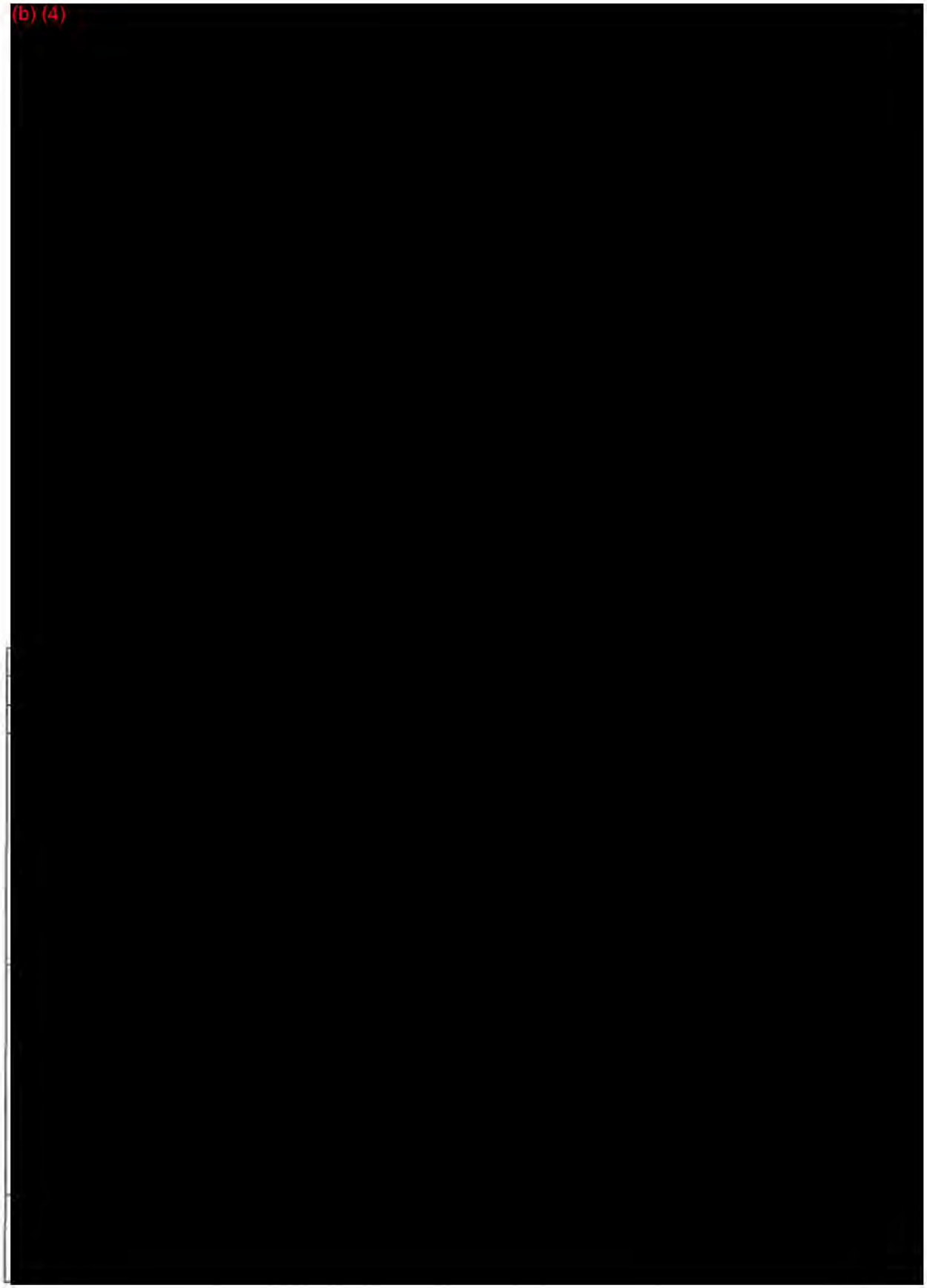

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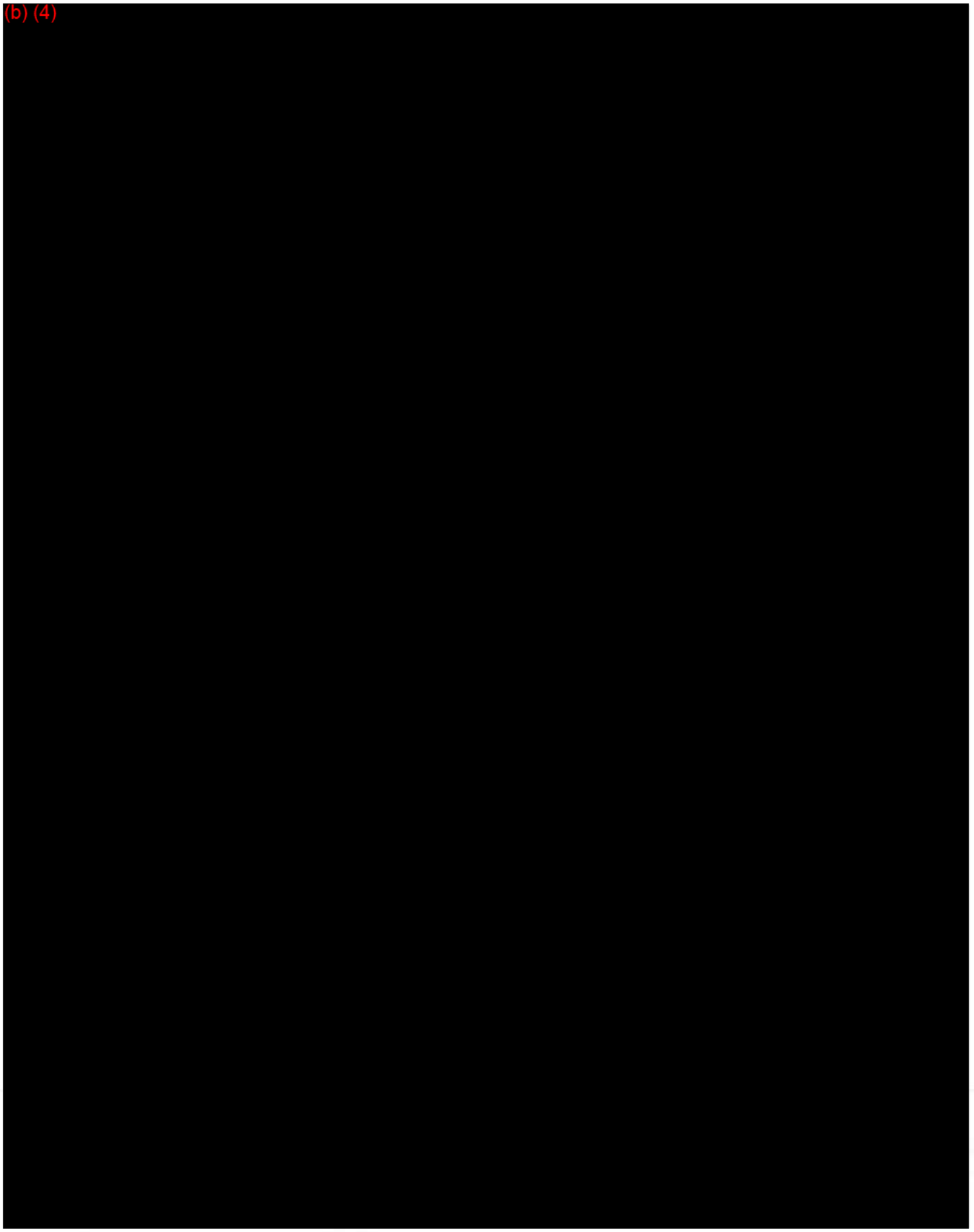

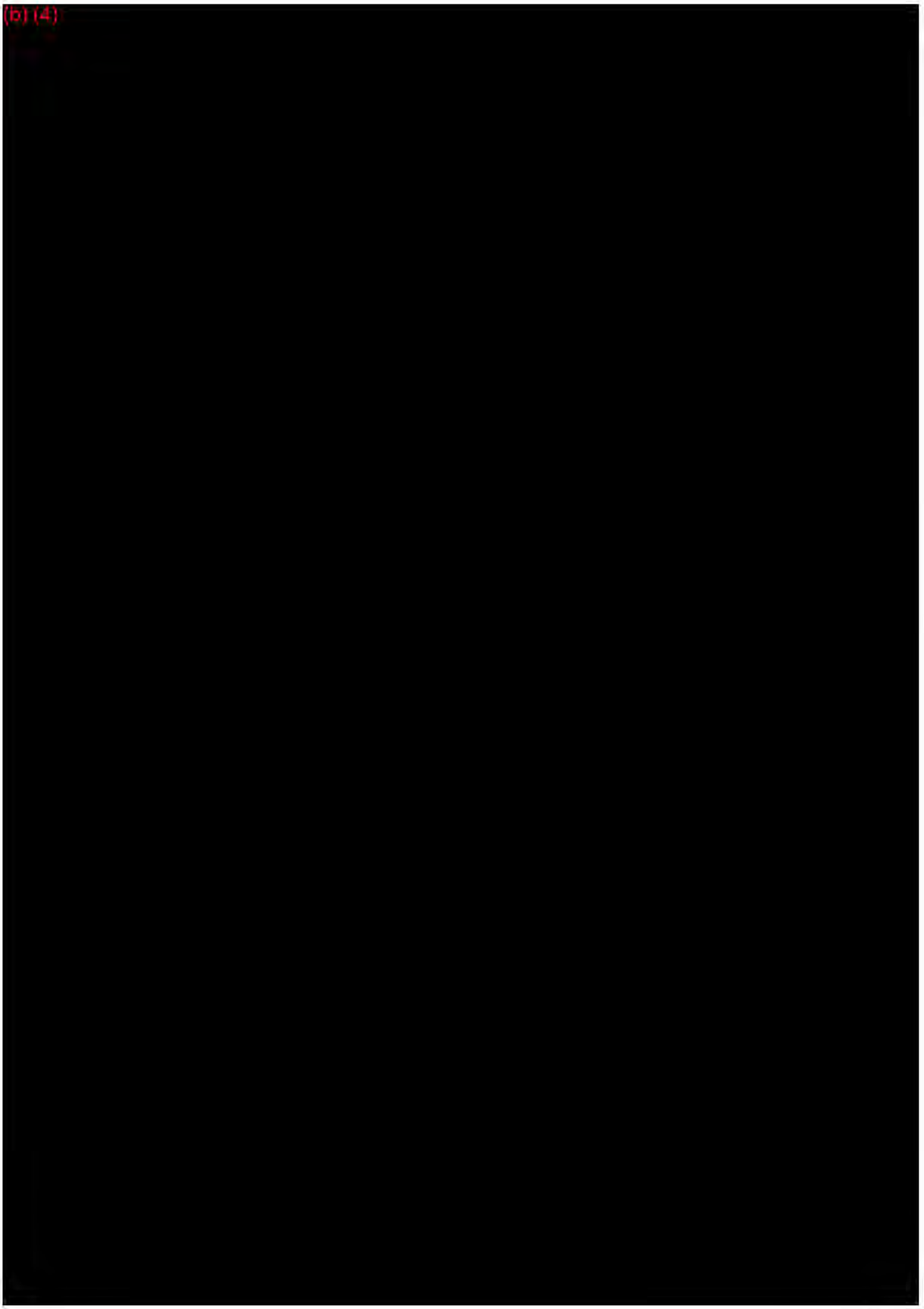
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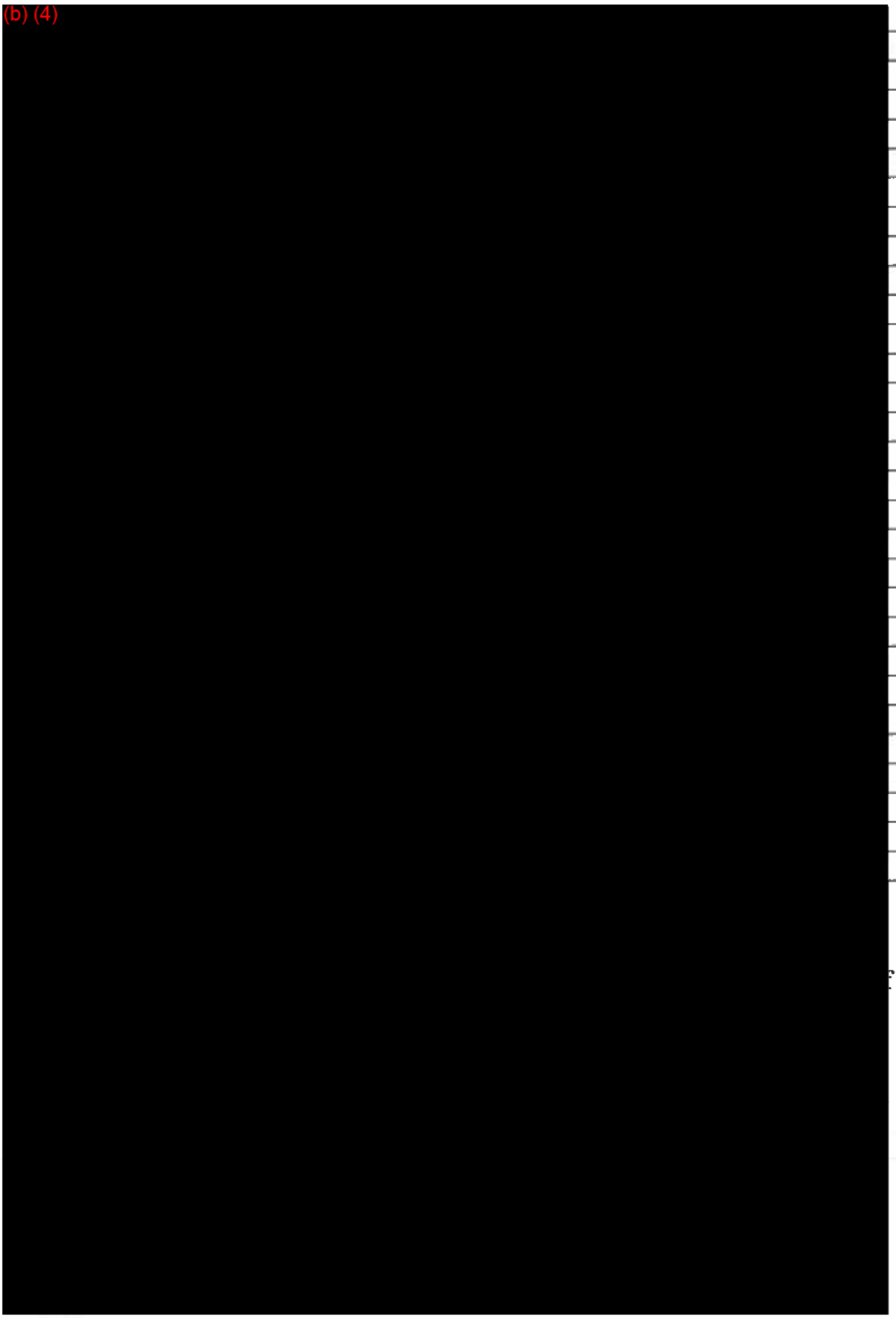

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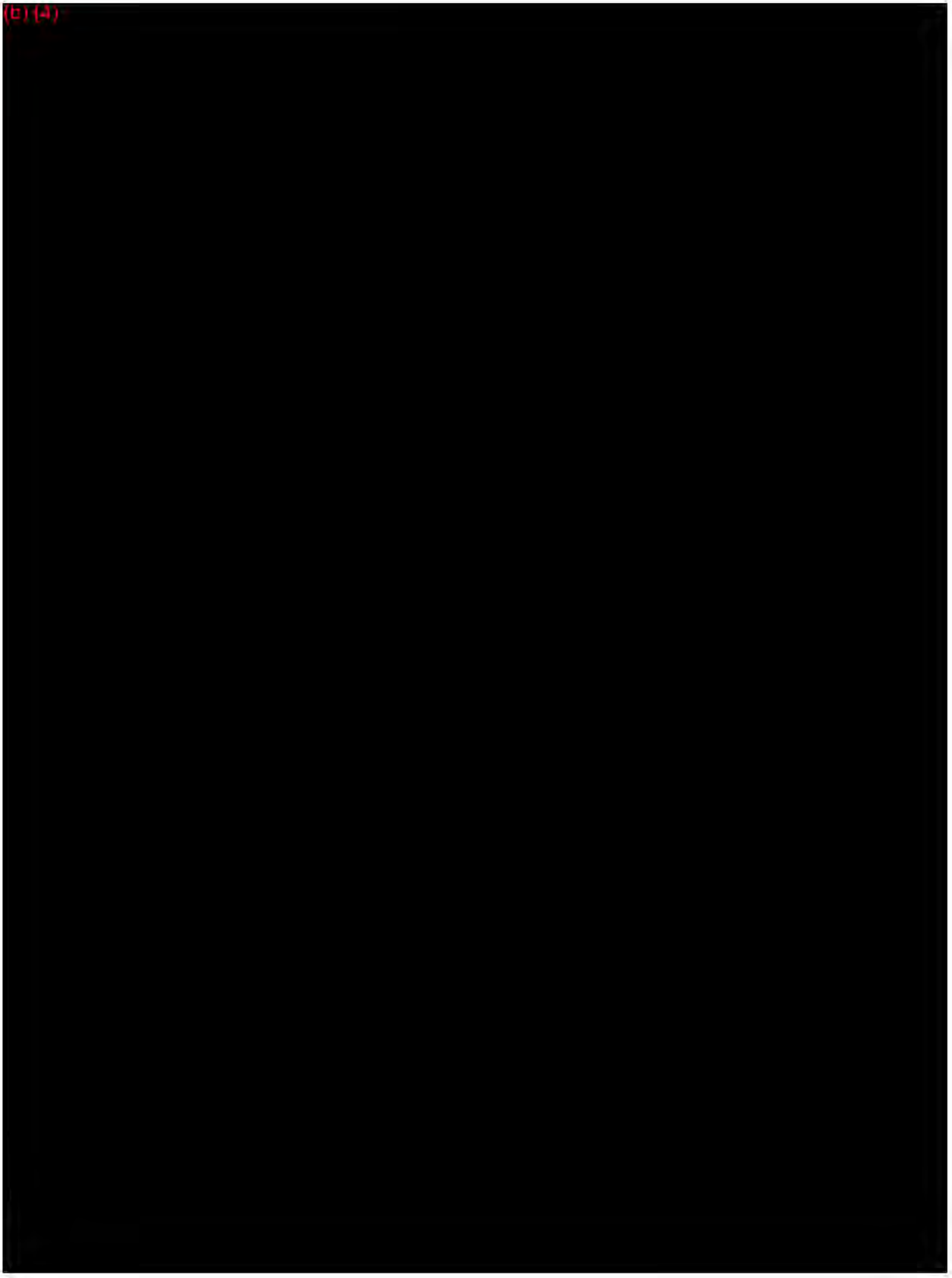

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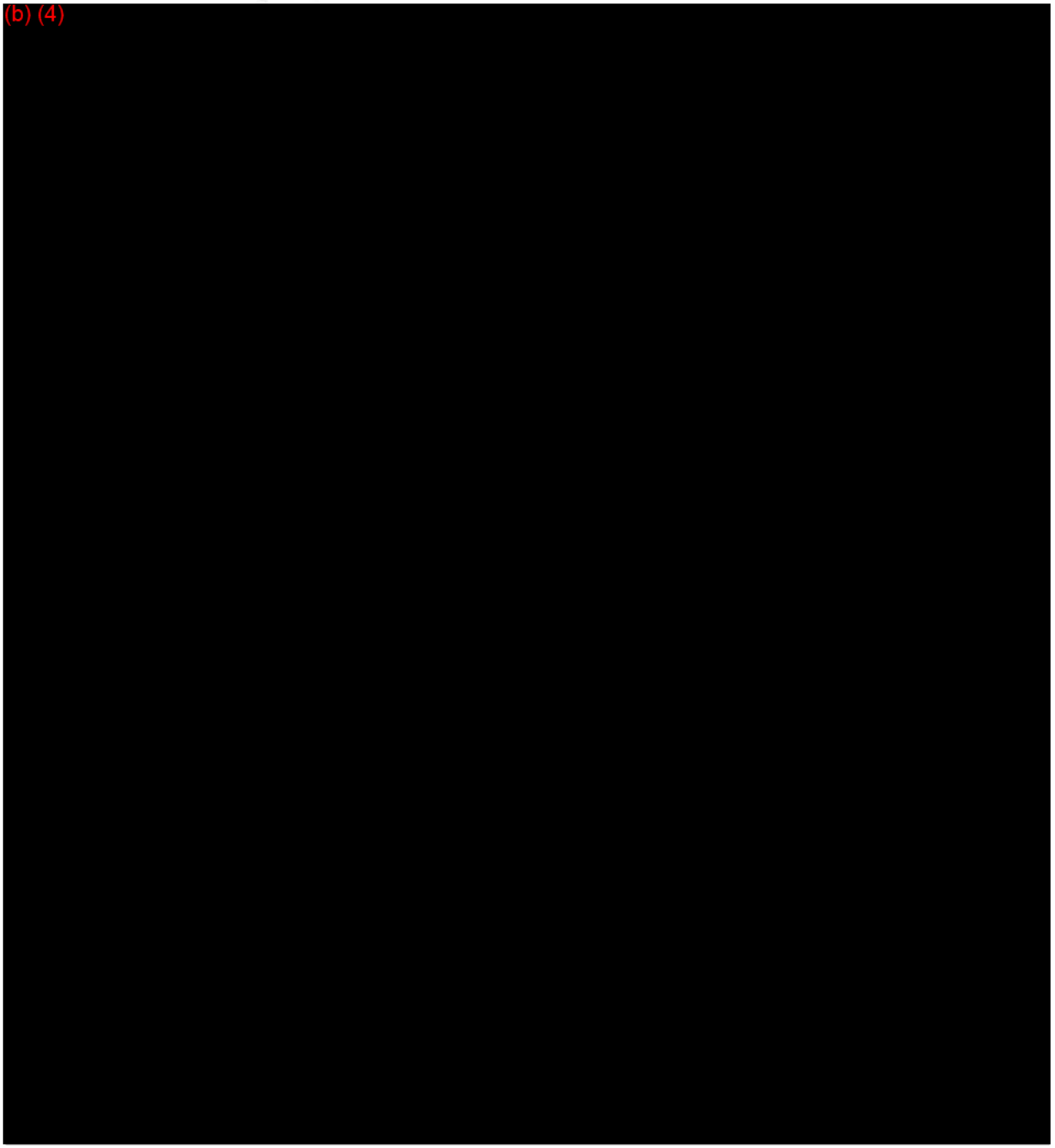

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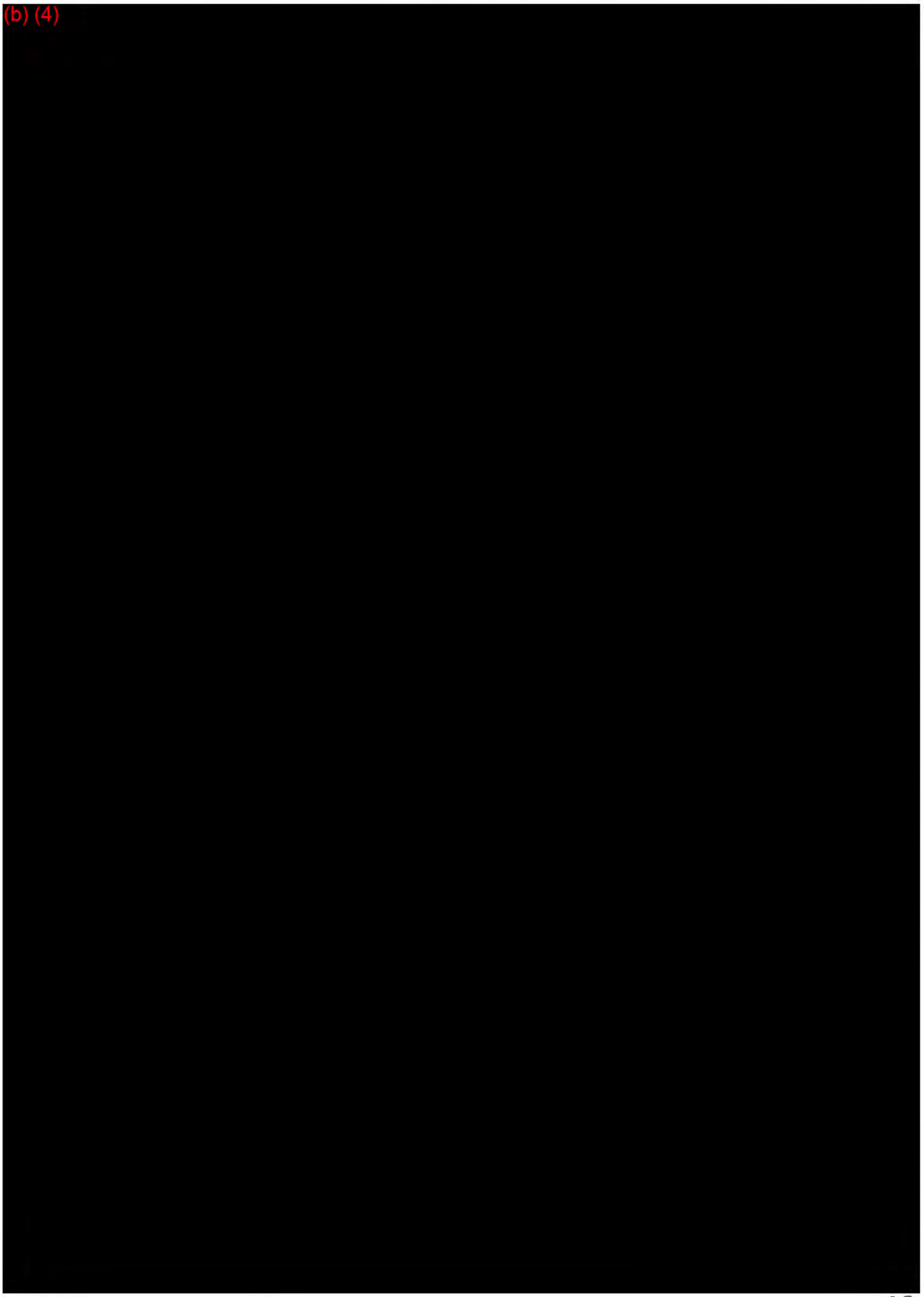

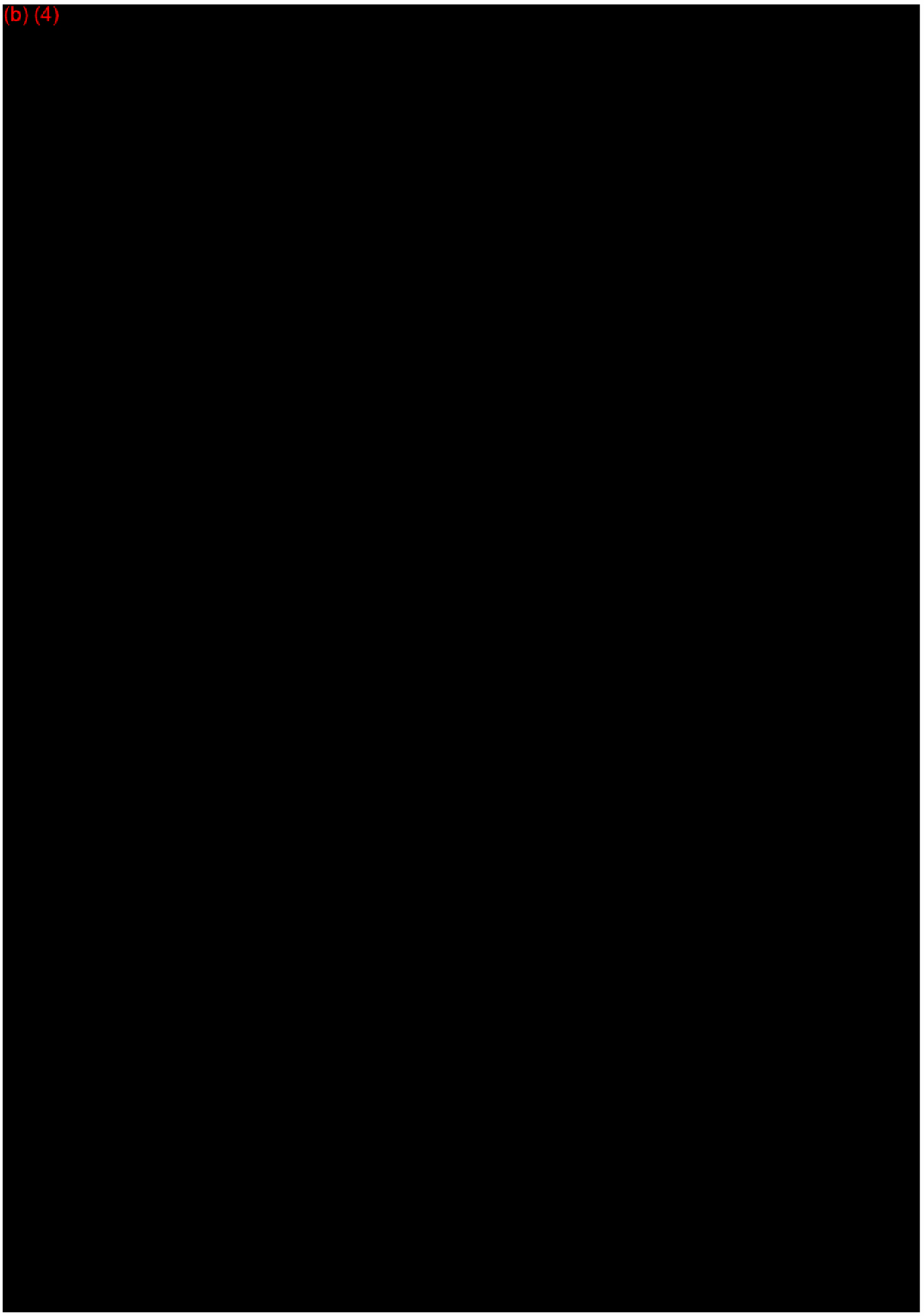
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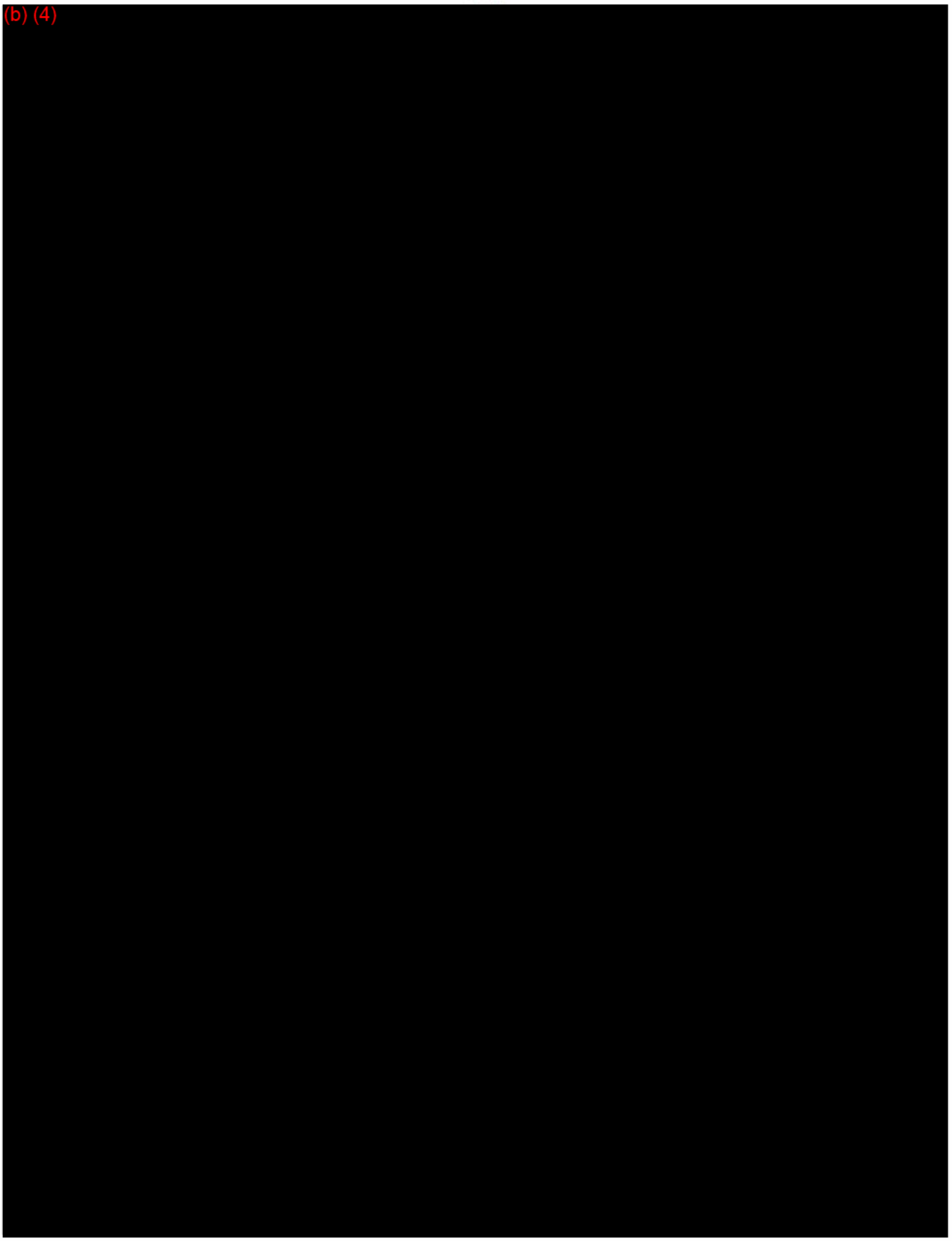
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MAR 2 7 2018

(b) (6) [redacted]

(b) (6) [redacted]

92-372/1231

DATE 3-12-18

US Fish & Wildlife Service | $100 00

PAY TO THE ORDER OF

one hundred and no/100 DOLLARS

usbank. All of us serving you®

MEMO

(b) (6) [redacted]

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

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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

RCVD MAR 27 2018

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 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: Dwight (b) (6) Dowdle

Date: 3/10/18

RCVD MAR 27 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Van Brunt	Dwight	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Kalispell	MT	(b) (6)		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. 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): 03/19/2018

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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

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

   John Jackson, Conservation Force, (504) 837-1233, cf@conservationforce.org

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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo melanochaita - 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:

   Namibia, Kalahari Game Lodge, Karas Region, 25 29'5.22 S, 19 52'37.08 E

   b. Date wildlife is to be hunted: April 28 - May 13, 2018

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

   Jamy Traut Hunting Safaris, Jamy Traut

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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). N/A - Not yet hunted

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:	
Business Name:	
Address:	Jamy Traut Hunting SAFARIS
City:	Farm Gravenstein 65
State/Province:	Windhoek, Namibia 9000
Country, Postal Code:	

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?

According to the landowner, Kalahari Game Lodge, the lion population on their property is wonderfully stable and increasing. In fact, population has increased to the point that at least two large males we killed in territorial disputes in 2017.

   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?

All trophy fees from this hunt will be used by the landowner to enhance the lion population on the property. Primary applications will be habitat improvement (permitting lion prides to spread to portions of the property currently unused, thereby reducing conflicts) and the continuance of ongoing study. I have paid $20,000 to the professional hunter long ago and will be paying another $30,000+ to the landowner prior to the hunt.

   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?

The landowner is a wonderful steward of the tremendous wildlife species and population which inhabit their 250K acres. The lion population has been carefully monitored and studied for years. The situation is somewhat pressing, as both population growth and conflict have resulted in the death of at least two mature males in recent months. No lion hunting has taken place for over three years, but the landowner now believes the best course of action is to permit the hunting of one old male to relieve some of the stress on the population, with the hunting fee earmarked for habitat improvement and continued study. The landowner feels that if an old male is not taken soon, that additional conflict will occur and the opportunity lost forever.

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 03/19/2018

    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.

All international shipment(s) must be imported 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).

kalahari
GAME LODGE
NAMIBIA

15 March 2018

To Whom It May Concern,

Enhancement of free roaming Kalahari Lions

The Kalahari Game Lodge (herein KGL) is a private game lodge of 40,000 contiguous hectares bordering the Kgalagadi Transfrontier Park on Namibia's south-eastern border. More specifically, it is approximately 18 kilometers west of the Mata-Mata border post.

While primary commercial activities include game viewing, 4x4 drives, hiking, birding and other tourism activities, KGL has a well-established history of being professionally hunted for plains game and lion. Hunting is not only a meaningful source of revenue, but entirely necessary in order to keep populations balanced and in check. Jamy Traut of Jamy Traut Hunting Safaris has exclusively conducted these hunts since 2011.

At this time, KGL has determined it necessary to take out four lions in order to balance with available food (prey) and habitat (territory size). At least two adult/mature male lions were killed in territorial disputes in 2017, and we believe it now necessary to remove two additional adult males and two adult females as quickly as possible in order to avoid further conflict and loss. These internal population conflicts and potential risks of migration of surplus lions to neighbouring areas where livestock is a major source of income, has been recognized by the Namibian Ministry of Environment and Tourism, and they have granted KGL with permits to hunt two lions during 2018.

Current population – KGL closely monitors lion population numbers. The population is growing dynamically due to natural recruitment (birth) and migration.

KGL currently supports a population of approximately 22 wild lions, distributed as follows:

1 x males age 10+ years
1 x males age 6-9 years
4 x males age 3-5 years

4 x females age 6-9 years
4 x females age 3-5 year

8 x additional lions age under 3 years males & Females

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer

kalahari
GAME LODGE
NAMIBIA

Migration – KGL border is fenced and has been for many years. Even with constant monitoring, maintenance and improvement, lions are still entering the property. This recruitment causes immediate conflict with and imposes stress upon existing prides. Given the nature of lions, mortality of both cubs and mature males has become a pressing concern.

Summary – Authorized by the Namibian Government, KGL will be able to selectively remove two adult lions this year. Doing so will provide a significant amount of revenue that will be turned back to the property for game management, relieve stress on the existing lion and plains game populations and contribute also contribute to local employment.

Kind Regards,

DE Dreyer

Vat Number: 0040130015 | Reg Number: 85/02652

Kalahari Gemsbok Ranch (Pty) ltd.

Tel: +264 63 252 052 | Email: info@kalaharigamelodge.com.na | Web: www.kalaharigamelodge.com.na
Physical Address: Route C15, Mata-Mata, Karas Region, Namibia

Direkteure / Directors: D.E. Dreyer

kalahari
GAME LODGE
NAMIBIA

kalahari
GAME LODGE
NAMIBIA

+ ECOLOGY

+ SPECIES

- REHABILITATION AND CONSERVATION

The Kalahari Game Lodge and it's surrounding 40 000 ha was previously used for farming sheep and cattle. As a result, the livestock fences had to be removed before wildlife could be re-established.

Accordingly, the lodge initiated a number of restoration projects to restore the natural grassland to its unadulterated state and reintroduce the wildlife that naturally occurred in this area. The aim is to restore the Kalahari eco-system that was largely destroyed by farming, which disbursed much of the natural wildlife in Namibia's Kalahari Desert.

Currently, Kalahari Game Lodge is home to the only population of free-roaming Kalahari lion in Namibia. Our aim is to create a conservation area in which these magnificent animals are protected amid surrounding farmlands.

A unique feature of the male lions is their often very dark to almost pitch black manes. This is due to the specific genetic make-up of the Kalahari lion population; accordingly, we are careful not to introduce other genealogies to the region. To see the magnificent beasts in their natural habitat is indeed a wonderful and memorable experience!

In addition to the black-mane Kalahari lion, the lodge is also home to a number of endangered species that roam the dunes. Among them are the brown hyena, pangolin, African hedgehog, and the striped polecat.

About

Reaching the Kalahari Game Lodge
Namibia

Accommodation

The Lodge
Campsites
Rates
Facilities

Activities

Lion Tracking
Game Viewing
4x4 Drives
Dune Braai
Hiking
Birding

Wildlife and sustainability

Ecology
Species
Rehabilitation and conservation

Gallery

Lodge and Campsites
Wildlife
Activities

kalahari
GAME LODGE
NAMIBIA

MAR 2 7 2018

(b) (6) [redacted]

(b) (6) [redacted]

3/19 20 18

Pay to the Order of U.S. Fish & Wildlife Service $ 100.00

One hundred & 00 DOLLARS

park side

park side CREDIT UNION
Flathead Valley | Missoula
406-862-2652 | 406-728-4475
parksidefcu.com

FOR

(b) (6) [redacted]

(b) (6) [redacted]

APR 13 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
PANTELIDIS	ANASTASIOS	NA	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
WATERFORD	OH	(b) (6)		U.S.A.

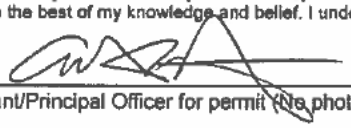
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

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.



04/04/2018

Signature of applicant/Principal Officer 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: 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)?

   Same as page 1

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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
1)Panthera leo melanochaita, lion2)Crocodylus niloticus, Nile crocodile 3)Imbabala-Tragelaphus scriptus, bushbu

b. Sex (if known).

1) male 2) male 3) 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:

o

N\A

b. Date wildlife is to be hunted:

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

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:

Country of Mozambiqe, Province of Tete, District of Zumbo, City of Zumbo,
Ranch: Chawalo Safaris Lodge in Zumbo, Tete, Mozambique

b. Date wildlife was hunted:

Lion was harvested on 7/30/2016
Crocodile was harvested on 8/02/2016
Bushbuck was harvested on 8/03/2016

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

Outfitter/guide was Russell Lovemore and Jaco Strauss from Chawalo Safaris

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]:

EMIAC MOZ LDA
COMPLEXO TESTAFRICA
BAIRRO DA SOALP
CHIMOIO
MOZAMBIQUE

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).

All permits/licenses were held and managed by the outfitter.

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: Senta Van Antwerp
Business Name: EMIAC MOZ LDA
Address: COMPLEXO TESTAFRICA
City: BAIRRO DA SOALPO
State/Province: CHIMOIO
Country, Postal Code: MOZAMBIQUE

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?

SEE ATTACHED SHEET

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?

SEE ATTACHED SHEET

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

SEE ATTACHED SHEET

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: _____ Date: 4/4/2018

    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).

9) a. Do you have any information regarding the population status or trend data on the species hunted?

I do not have any official data on this. What I can say and it will be repeated below, is the fact that we have been incredibly successful in curbing poaching. In the 7 years that we have operated and hunted on Chawalo game numbers have increased dramatically. Our area reaches 800 000 acres in extent, as per safari we were aware of 4 different lion males as well as several females moving within our limited coverage of the area. If we were to consider the average home range of lion males specifically there is every reason to be extremely optimistic in terms of numbers as we covered a total area of roughly 70 000 acres on this safari.

We have subscribed to the ethics and standard of only utilizing lion males of 7 years and older which research has proven as conducted in Tanzania limits and virtually nullifies infanticide, by continuing with these basic management principles as well as the highly controlled off take of 1 lion male per annum on a total of 800 000 acres, there is no reason to assume that our population is under stress or pressure. Furthermore every specie hunted is inspected and aged by means of jaw, should we be deemed to harvest juvenile or continually harvesting prime breeding animals our quota will be reduced for the following season, taking females by accident or mistake is also punished with heavy fines in excess of $5000.

b. In order to hunt, you likely paid for licenses or trophy fees. Do you have any information on how those funds were used by either the landowner, community, or government?

Yes, we did pay for hunting licenses and tag. One third of the tag fees go to the local population, that inhabit the area and villages on the periphery, one third goes to the Tchuma Tchatu program a program that train and equip scouts to protect the area. So this very program train and equip Scouts that compliment our scouts on the ground to curb poaching.

Tchuma Tcatu is a community program, these communities would have zero benefit from wildlife that they share the areas with and I shudder to think what would happen if this incentive or program was to be abolished.

In short these areas would turn to livestock land and we would effectively lose wildlife habitat as the wildlife occurring in these areas would turn into a liability to local communities, this program has been successful to the point of giving wildlife a tangible value within local communities, in cooperation with us as outfitters operating on these areas.

A portion of funds generated from foreign hunting activities by the outfitter also gets paid to the community by the outfitter once a year in November or December and there is a local committee that decides how these funds will be spent within the conservation area as there are ten villages that need to benefit from this. It is used for schools, clinics, water wells and the like. We have also received donations from SCI and they have built and mobilized a clinic which operates on our western

boundary, on the Luangwa river. We have been extremely successful in involving our local communities in a positive way, I can not stress the importance of community involvement enough, in an impoverished country such as Mozambique this is the of the utmost importance.

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

As outfitter we have initiated a program whereby a community levy is asked from each foreign hunter this over and above funds generated from the community tax levied to each hunter, is then applied to also improve and benefit the local community on condition that they assist in the protection of the local wildlife by assisting in limiting poaching, controlling the wild fires primarily.

They will also receive rewards and benefits for sound information provided on Lion, Leoapard and elephant movements in the area.

Currently we employ a total of 25 full time anti-poaching scouts these scouts are paid for by the outfitter and inherently by our hunting clients, we have succeeded in curbing poaching to a large degree with countless muzzle loaders (homemade) as well as snares and other equipment used for poaching being confiscated on information supplied directly by members of our local community, and also from our armed - mobilized anti-poaching teams. There is no doubt that poaching could be brought to a complete stop if we were able to encourage more hunters to venture into our area in Mozambique.

As a further note when we took over the area 7 years ago we had knowledge of roughly 40 buffalo, we now have a solid heard of around 250 around camp with various smaller satellite herds scattered throughout the areas entirety, small game such as Duiker, impala, Kudu, Roan, warthog have also made a remarkable comeback, and with that our predator numbers have done exceptionally well. It is of cardinal importance that we continue to fight the illegal trade in wildlife products and the continued support of the international trophy hunting market and our loyal clients and organizations such as SCI and DSC will ensure the resources for us to do so.

The 1 lion, 2 leopard, Crocodile, buffalo and plains game that we receive on quota and the funds generated from these species is integral to the continued survival of wildlife habitat, we need to encourage USFWS to seriously consider an amendment to the lion import policy as it will either aid in the demise or the survival of our natural resources.

My best always,

Jaco Strauss, PH/Outfitter

To whom it may concern,

I feel compelled to write this statement about my many trips to Africa. There is great beauty as well as unimaginable poverty and destruction. While traversing the continent you see the many villages, the wildlife and the ever changing landscape. Over the years some of the familiar areas have been desolated by human incursion from the slash/burn farming, clear cut timbering with ALL trees going to China and strip mining for coal. Some areas are "protected" with the local or national parks label but there is little supervision and the constant human encroachment and poaching result in an ever dwindling wildlife populations. On every trip to Africa with the exception of this one, there were always snares, traps and other cruel methods to poach the game. In the field I did not see or find a single example of poaching but at the lodge there was a nice collection of homemade muzzleloaders/firearms that had been confiscated or surrendered. One of the main reasons for such success are the anti-poaching units employed by Chawalo safaris. During my stay I met 2 of the traveling/patrolling anti-poaching units.

What makes the Chawalo Safaris area so special is the care, effort and expense they have put into making it the most pristine wildlife area that I have ever encountered. There is still a rather sizable human presence but through extensive interactions, education, acts of kindness and monetary rewards the local people have made great strides in preserving the wildlife especially with their efforts to stop all poaching. The funds that are generated through hunting have allowed Chawalo to establish a sound, renewable resource that brings much needed funds to an otherwise poor area.

A side note for consideration, we encountered a couple of young male lions, 2-4 years of age, traveling together. Before I even had a chance, Jaco Strauss (P.H.) said they were too young and he would not allow me to take one. If the cat wasn't at least 7 years old we would not be shooting it. That strong conviction to only harvest mature animals was a refreshing and pride inducing moment. The lion that was eventually harvested was at least 7 years old and a loner. He was mature but it was quite obvious that he was declining in health and stature. The perfect animal to harvest.

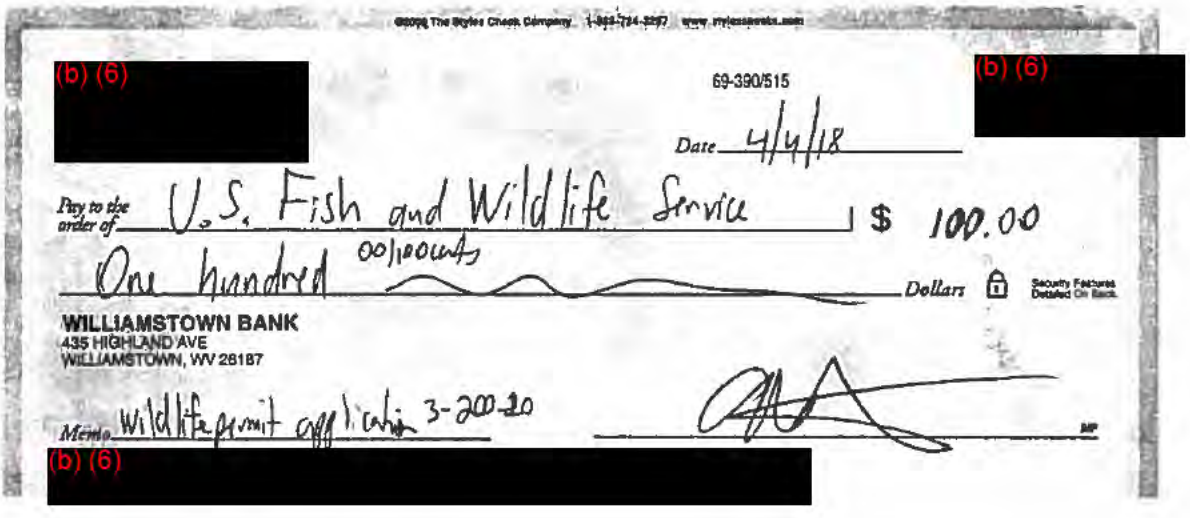
Another area where hunting funds have allowed Chawalo to assist in and establish harmony amongst the locals is the creation of Chissavo Clinic. A small medical clinic that treats the locals (and some not so local) residents. After an on-site visit, walk-through and interactions with the patients I was so impressed that I have made the decision to return and donate my services.

When making your determination for importation please consider my personal statement. Chawalo Safaris is not your average or typical outfitter. They have vastly improved the area not just for the wildlife but the locals as well. If all outfitters were half as conscientious and committed we would have a better world.

Thank you for your time,

Anastasios Pantelidis, M.D.

APR 13 2018



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(b) (6)

69-390/515

(b) (6)

Date 4/4/18

Pay to the order of U.S. Fish and Wildlife Service $ 100.00

One hundred 00/100 cents Dollars

Security Features Detailed On Back

WILLIAMSTOWN BANK
435 HIGHLAND AVE
WILLIAMSTOWN, WV 26187

Memo wildlife permit application 3-200-20

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAY 11 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kampeter	Andrew	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Wardsville	Missouri	(b) (6)		United States

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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)

05/04/2018

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)?

   Andrew Kampeter (b) (6) [redacted]

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. NA

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Melanochaita, Southern 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:
   South Africa, Zululand, Kwa Zulu-Natal Province
   Mkuze Fall Private Game Reserve, Nearest City = Pongola or Nongoma

   b. Date wildlife is to be hunted:
   July 18, 2018 thru Aug 4, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Garry Kelly Safaris, Professional Hunter Sean Kelly

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:
   NA

   b. Date wildlife was hunted:
   NA

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

NA

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]:

NA

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). NA Dont Have permits yet

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: Rupert Dedekind
Business Name: Universal Trophey Service
Address: Plot 114
City: Bashewa
State/Province: Pretoria
Country, Postal Code: 0056

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?
Attached paper

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?
Attached papers

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
Attached

9a) Do you have any information regarding the population status or trend data on the species hunted?

The current property forms part of the Wild Managed population of Lions in South Africa, as defined in terms of the Biodiversity Management Plan for Lion in South Africa. Furthermore, the property is contributing to the meta-population for the province of KwaZulu-Natal and subscribes to the principles for meta-population management as defined by the provincial conservation authority (Ezemvelo KwaZulu-Natal Wildlife). There are currently 18 lions on the property, of which three are available for offtake. Such offtakes will mimic natural population changes wherein old males are forced out of the pride structure. The property has had lions for the preceeding 10 years and have been managed to ensure the genetic intergrity of the prides on the property.
There are 18 lions on the concession. 5 Males, the rest are females & cubs. We have been advised that there are too many Lions on the concession & have been allocated 3 to take off.

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?

Hunting permit and licences fees are paid to the provincial conservation authority, Ezemvelo KwaZulu-Natal Wildlife, with such funds being utilised to manage sustainable resource use in the province. The funds assist in the processing of hunting permits wherein the sustainability of each application is assessed and approved when appropropriate.
The funds are used in various ways, but mainly for paying scouts for anti poaching initiatives, the re establishment of the species, security, upliftment of the area including fencing & roads.
The permit costs are R1000 & the concession fee is $35 000

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?

The concession is owned by the local community and the funds generated through hunting activities assists in the upliftment of the community through job creation and food provision.
The safari outfitter funds the landowners through the concession fees paid by clients. These funds are used for the protection of game (the $35,000). Should there be no fees, there will be no protection of the game initiatives (scouts).

OMB Control No. 1018-0093
Expires 08/31/2020

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: _____

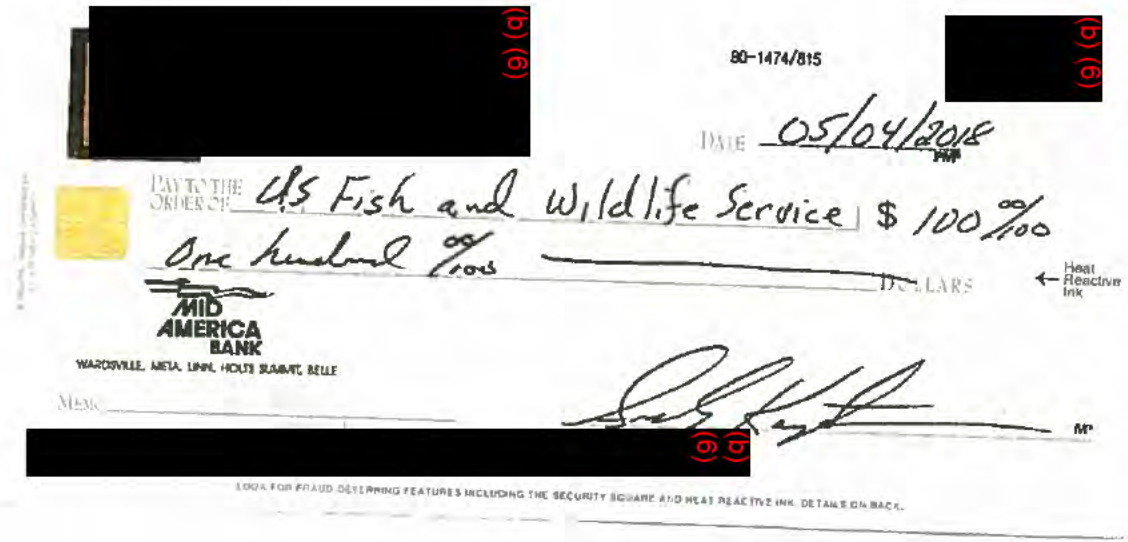
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    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: _____ Date: 05/04/2018

    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).


[redacted] (b) (6)

80-1474/815

[redacted] (b) (6)

DATE 05/04/2018

PAY TO THE ORDER OF US Fish and Wildlife Service $ 100 00/100

One hundred 00/100 DOLLARS

Heat Reactive Ink

MID AMERICA BANK

WARDSVILLE, META, LINN, HOLTS SUMMIT, BELLE

MEMO

[redacted] (b) (6)

LOOK FOR FRAUD DETERRING FEATURES INCLUDING THE SECURITY SQUARE AND HEAT REACTIVE INK. DETAILS ON BACK.

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 ELEPHANT & 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: DENNIS C HIRSCHFELD

Date: 4-12-2018

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hirschfeld	Dennis	C	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
San Angelo	Texas	(b) (6)		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. 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): 04/25/2018

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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

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

   Conservation Force , 504-837-1233 , cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   ELEPHANT LOXODONTA AFRICANA

   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:

   Country -- Namibia , Region -- Zambezi East , Area -- Salambala (conservancy)

   b. Date wildlife is to be hunted: September17-Oct 2 , 2018

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

   Madubula Safaris -- John Abraham

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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).

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:	JOHN ABRAHAM
Business Name:	REISER TAXIDERMY
Address:	BOX 11908 WINDHOEK, PLOT #43 BRAKWATER
City:	+264 61 264207
State/Province:	
Country, Postal Code:	REISER@IWAY.NA

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

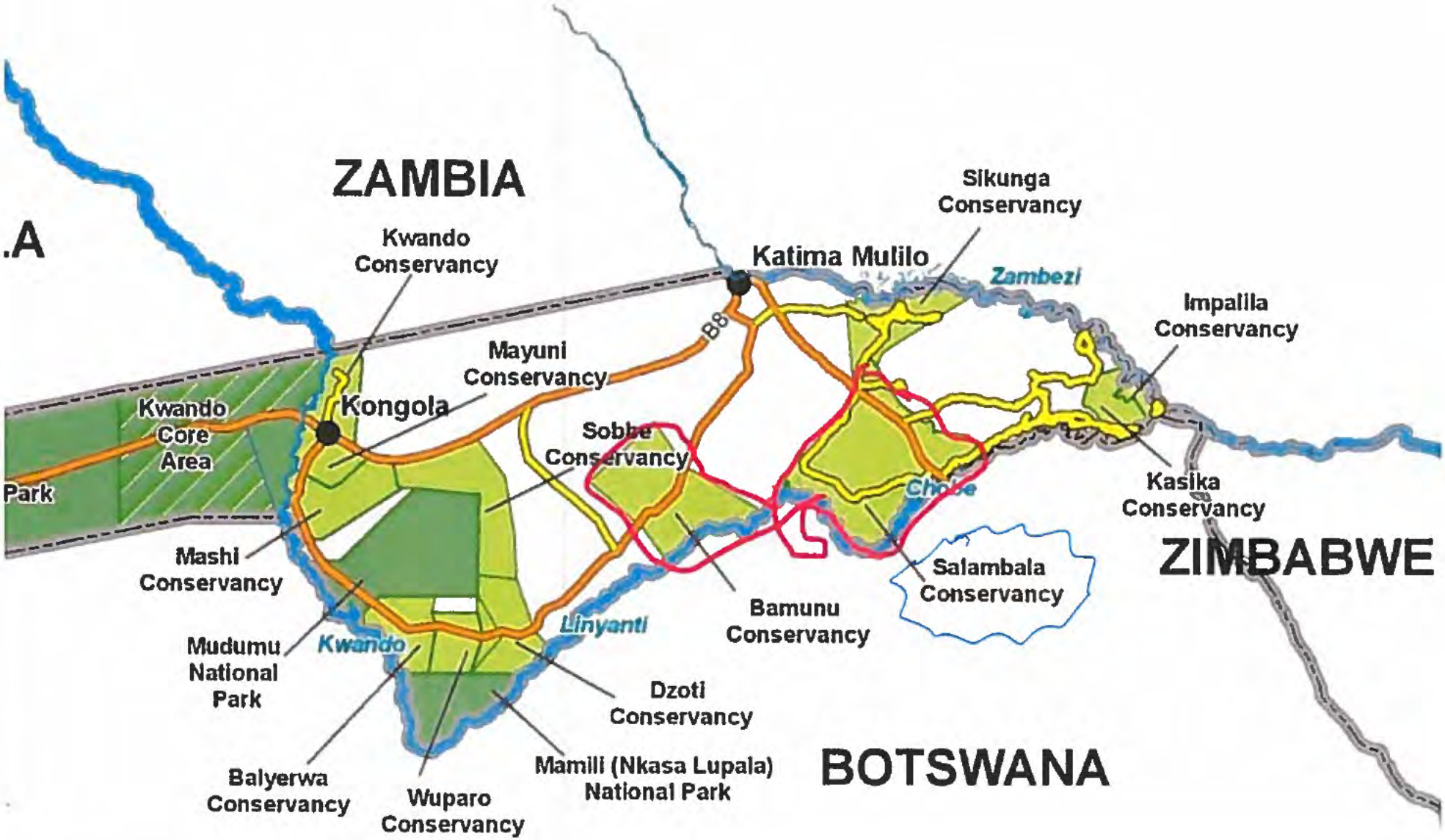
11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 09/25/2018

    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.

All international shipment(s) must be imported 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).


ZAMBIA
.A
Kwando Conservancy
Katima Mulilo
Sikunga Conservancy
Zambezi
Impalila Conservancy
B8
Mayuni Conservancy
Kongola
Kwando Core Area
Park
Sobbe Conservancy
Chobe
Kasika Conservancy
ZIMBABWE
Mashi Conservancy
Salambala Conservancy
Bamunu Conservancy
Linyanti
Kwando
Mudumu National Park
Dzoti Conservancy
Balyerwa Conservancy
Wuparo Conservancy
Mamili (Nkasa Lupala) National Park
BOTSWANA

Conservation Biology

Contributed Paper

Complementary benefits of tourism and hunting to communal conservancies in Namibia

Robin Naidoo,* L. Chris Weaver,† Richard W. Diggle,† Greenwell Matongo,† Greg Stuart-Hill,† and Chris Thouless†‡

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†WWF in Namibia, P.O. Box 9681, Windhoek, Namibia

Abstract: *Tourism and hunting both generate substantial revenues for communities and private operators in Africa, but few studies have quantitatively examined the trade-offs and synergies that may result from these two activities. We evaluated financial and in-kind benefit streams from tourism and hunting on 77 communal conservancies in Namibia from 1998 to 2013, where community-based wildlife conservation has been promoted as a land-use that complements traditional subsistence agriculture. We used data collected annually for all communal conservancies to characterize whether benefits were derived from hunting or tourism. We classified these benefits into 3 broad classes and examined how benefits flowed to stakeholders within communities under the status quo and under a simulated ban on hunting. Across all conservancies, total benefits from hunting and tourism increased at roughly the same rate, although conservancies typically started generating benefits from hunting within 3 years of formation as opposed to after 6 years for tourism. Disaggregation of data revealed that the main benefits from hunting were income for conservancy management and food in the form of meat for the community at large. The majority of tourism benefits were salaried jobs at lodges. A simulated ban on trophy hunting significantly reduced the number of conservancies that could cover their operating costs, whereas eliminating income from tourism did not have as severe an effect. Given that the benefits generated from hunting and tourism typically begin at different times in a conservancy's life-span (earlier vs. later, respectively) and flow to different segments of local communities, these 2 activities together may provide the greatest incentives for conservation on communal lands in Namibia. A singular focus on either hunting or tourism would reduce the value of wildlife as a competitive land-use option and have grave repercussions for the viability of community-based conservation efforts in Namibia, and possibly other parts of Africa.*

Keywords: communal lands, community-based conservation, financial benefits, hunting ban, in-kind benefits, stakeholders

Resumen: *El turismo y la caza generan ingresos públicos sustanciales para las comunidades y los operadores privados en África, pero pocos estudios han examinado cuantitativamente las compensaciones y las sinergias que pueden resultar de estas dos actividades. Evaluamos las oleadas de beneficios financieros y de pago en especie provenientes del turismo y la caza en 77 zonas de conservación comunal en Namibia desde 1998 a 2013, donde la conservación de vida silvestre basada en la comunidad ha sido promovida como un uso de suelo que complementa la agricultura tradicional de subsistencia. Usamos datos colectados anualmente de todas las zonas comunales para caracterizar si los beneficios se derivaron de la caza o el turismo. Clasificamos estos beneficios en tres categorías generales y examinamos cómo los beneficios fluyeron hacia los accionistas dentro de las comunidades bajo el status quo y bajo una prohibición simulada de la caza. En todas las zonas de conservación comunal, los beneficios totales de la caza y el turismo incrementaron aproximadamente a la misma tasa, aunque en estas zonas se comenzaron a generar beneficios de la caza normalmente dentro de los 3 años de formación, en contraste con del turismo que se generaron después de 6 años. La desagregación de los datos reveló que los principales beneficios de la caza fueron los ingresos para*

‡*Current address: Save the Elephants, Marula Manor, Marula Lane, Karen, P.O. Box 54667, Nairobi 00200, Kenya*
Paper submitted April 9, 2015, revised manuscript accepted October 6, 2015.

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el manejo de la conservación y la comida en forma de carne para la mayoría de la comunidad. La mayoría de los beneficios del turismo fueron trabajos a sueldo en hospedajes. Una prohibición simulada sobre la caza de trofeos redujo significativamente el número de zonas de conservación que podrían cubrir sus gastos de operación, mientras que la eliminación del ingreso por el turismo no tuvo un efecto severo. Dado que los beneficios generados por la caza y el turismo comienzan comúnmente a tiempos distintos en la duración total de la conservación (más temprano que más tarde, respectivamente) y fluyen a segmentos diferentes de las comunidades locales, estas dos actividades juntas pueden proporcionar incentivos más grandes para la conservación en las tierras comunales de Namibia. Un foco único sobre la caza o el turismo puede reducir el valor de la vida silvestre como opción de uso de suelo competitivo y tener repercusiones graves sobre la viabilidad de los esfuerzos de conservación basada en comunidades de Namibia, y posiblemente de otras partes de África.

Palabras Clave: accionistas, beneficios financieros, beneficios de pago en especie, conservación basada en la comunidad, prohibición de la caza, tierras comunales

Introduction

Current paradigms in conservation increasingly emphasize the utilitarian aspect of safeguarding biodiversity (Daily et al. 2009; Redford & Adams 2009; Guerry et al. 2015), as opposed to more traditional strategies such as protected areas and strict land-use zoning. Ecosystem service approaches and payments for environmental services (PES) schemes are based on the assumption that ensuring a supply of environmental benefits to people will result in the conservation of biodiversity and of natural areas (Tallis et al. 2009; Tallis & Polasky 2009). However, this increasing emphasis on a utilitarian approach to conservation has spawned much debate and criticism. Some contend this new conservation diverts efforts away from ensuring the persistence of biodiversity and puts too much focus on human needs and well-being (Soule 2013; Doak et al. 2014). Others argue that PES programs and partnerships with corporations are resulting in the commodification of nature and that market-based approaches are likely to favor the rich, powerful, and foreign at the expense of local communities and the poor (Sullivan 2006; Igoe et al. 2010).

Although approaches to natural resource management and biodiversity conservation in southern Africa have long been grounded in similar utilitarian perspectives (Child 2004; Carruthers 2008), few approaches to conservation are currently as controversial as the hunting of large and charismatic species as a means of generating benefits and incentives for conservation in this part of the world (Lindsey et al. 2006; Lindsey et al. 2007). Heightened concerns surrounding animal rights and the ethics of hunting, often inflamed by images on social media of trophy hunters posing with dead animals, have led to an increasingly vocal Western opposition to trophy hunting in Africa. This opposition is contributing to tangible policy changes, including the banning of trophy hunting in Botswana (Pabst 2013), restrictions on imports of trophies of certain species to countries such as the United States and Australia (Milman 2015), and the barring of trophies from being transported on some major commercial airlines (Wieczner 2015). Ironically, this Western opposition to trophy hunting comes despite the fact that hunting benefits were one of the early motivations for conservation in North America (Geist et al. 2001), and even today proceeds from hunting licenses in the United States (via the Pittman-Robertson Act) and Canada continue to generate hundreds of millions of dollars every year for wildlife management and habitat protection (Arnett & Southwick 2015).

The impact that changes in hunting policies may have on the conservation of wildlife and on the incentives for African people to coexist with wildlife is not well understood (Buckley & Mossaz 2015). There has been little examination of how benefits from hunting compare with benefits from nonconsumptive nature-based tourism in terms of incentives for local people to conserve species and wildlife habitat, although others have suggested the two may be complementary, rather than substitutive, activities (Leader-Williams et al. 2001; Lindsey et al. 2006). A major limitation is that data on the variety of financial benefits that wildlife generate are typically not systematically collected, especially across different temporal and spatial scales. Yet understanding who benefits, and how, from wildlife as a land use is a critical prerequisite to designing effective policies and programs that support conservation as a sustainable alternative to other, less biodiversity friendly, land uses.

Despite the above knowledge gaps, it is clear that for wildlife to survive outside (and perhaps even inside) protected areas in Africa, people must have strong incentives to tolerate, or ideally embrace, wildlife as a land use (Roe et al. 2009; Dickman et al. 2011; Child et al. 2012). Given that strict protected areas comprise a small and unrepresentative fraction of the African continent, and that even within protected areas wildlife is declining (Western et al. 2009; Craigie et al. 2010), approaches that seek to capture multiple benefits from wildlife conservation on state, private, and communal lands in Africa are indispensable. This principle is especially important when considering the diverse relationships between local communities and wildlife. Communities living with wildlife

are not monolithic entities; rather, they are composed of different groups of people who will experience different costs and benefits from wildlife conservation (Agrawal & Gibson 1999; Roe et al. 2009). For example, wealthy cattle owners and poor subsistence farmers will have different perceptions of wildlife conservation given the particular costs and benefits they are likely to experience. Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives. Because communal lands comprise a large fraction of rural Africa (up to 500% more than state-managed forest reserves and national parks [Alden Wily 2011]), management of these lands will play a huge role in determining the success or failure of biodiversity conservation efforts across the continent.

We focused on how different types of benefits provided by wildlife vary over time, space, and community stakeholder groups in communal conservancies in Namibia. Namibia's Community-Based Natural Resource Management (CBNRM) program began in the mid-1990s, when progressive legislation for the devolution of conditional rights to natural resources allowed communities to register areas of customary landholding as "communal conservancies." Registering these conservancies (involving developing zoning and sustainable resource management plans and a constitution) allows local communities to manage and benefit from wildlife and other natural resources on their traditional lands. Prior to the legislation, natural resources were the sole property of the state. Although wildlife has been used by people for millennia in the region that is now Namibia, the last century was characterized by declines in various species, starting with the rinderpest outbreak at the end of the 19th century, followed by overhunting of big game species by colonial hunters, and more recently by a major drought combined with a poaching increase in the 1980s (Owen-Smith 2010). Namibia's CBNRM program is widely recognized as having contributed to a strong recovery of wildlife in large parts of the country, through the creation of social and economic incentives for the sustainable coexistence of wildlife and people on communal lands (Owen-Smith 2010; Naidoo et al. 2011*b*; NACSO 2013). Additionally, the principles used to incentivize communities to steward wildlife across very large spatial scales are already being adopted by numerous other countries in Africa and beyond (NACSO 2013). We examined how changes in benefits over time generated on communal conservancies in Namibia vary according to whether they were derived from tourism or hunting (the 2 most significant benefits derived from wildlife). We also assessed how these benefits flow to different stakeholders within local communities and how factors such as time of establishment and changes in resource management policies affect such benefit flows on communal lands.

Methods

We used data from 77 communal conservancies registered by 2012 in Namibia to examine benefit flows associated with hunting and photographic tourism. The first four of these conservancies were established in 1998, and we used data through the 2013 calendar year for all of them. For both hunting and tourism, conservancies negotiate agreements with private operators. The agreements between conservancies and operators specify the portion of income the conservancy receives (typically 8–12% of total lodge revenue and from 30–75% of trophy price, depending on the species) and jobs to be offered to community members with the operation (from 20–50 for tourism lodges, depending on factors such as size and location, and 8–10 for hunting camps). In addition, community members hunt for subsistence and allow local sales of meat from wildlife through game cropping. Information on fees paid to conservancy management committees; salaries of community members employed in the tourism or hunting industry; and nonfinancial benefits (primarily meat from hunting, but also meals, training, human-wildlife conflict compensation, and other donations to the community at large) is compiled annually by every conservancy. Financial reporting of conservancies is supported by various nongovernmental organizations, is ground-truthed, and is double-checked against analogous reports from tourism and hunting operators.

We used these data and categorized each source of benefit as to whether it was derived from tourism or from hunting. The CBNRM program uses the price of buying alternative meat as the value of wild meat distributed from animals that were hunted (replacement-cost shadow price approach). In 2013, it was 18 Namibian dollars/kg of meat (NACSO 2013). This shadow price can vary and is adjusted from year to year to reflect supply and demand, but the same rate is applied across the country in order to maintain comparability of meat benefits generated in different regions. We used a consumer price index produced by the Bank of Namibia to standardize benefit figures from all years into constant 2013 Namibian dollars. We subsequently expressed all figures in 2013 U.S. dollars (U.S.$) based on the average monthly exchange rate in 2013 of U.S.$1 = N$9.64.

We divided benefits into the 3 classes (described above) because each represented a different type of gain that is channeled to different parts of a conservancy and has different implications for the sustainability of the conservancy and for its livelihood value to members. Income (i.e., fees from lodge and hunting concessions) to management committees is used by conservancies to cover operational and management costs

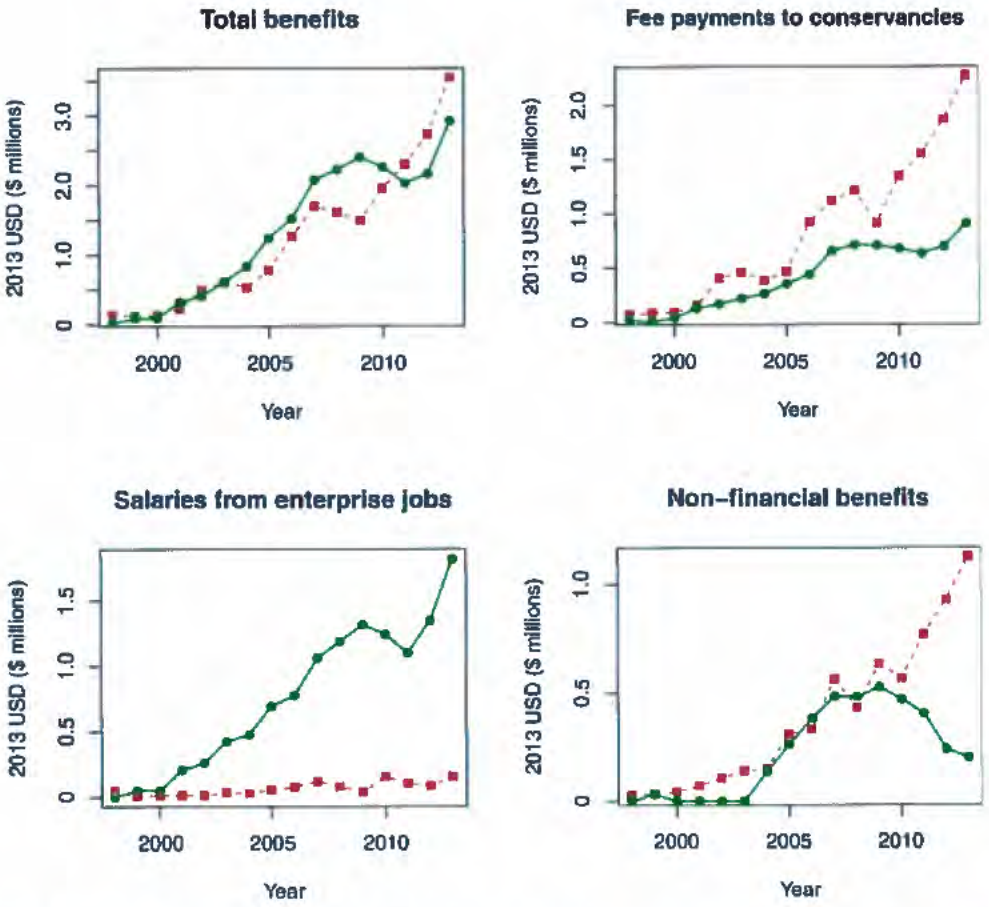

Figure 1. Benefits generated across all conservancies in Namibia's Community-Based Natural Resource Management program, 1998–2013, from hunting (squares) and tourism (circles): (a) total benefits, (b) fee payments to conservancies, (c) salaries from enterprise jobs, and (d) nonfinancial benefits.

(including paying the salaries of community game guards and other conservancy staff members, vehicle fuel costs and maintenance, and office upkeep expenses) and is also distributed as cash and funds for development projects within the community. Individual conservancy members who are salaried employees at tourism lodges or hunting camps clearly benefit financially from conservation, and this linkage should result in strong incentives for promoting wildlife as a land use in their households and among their families and social networks within the community. Conservancy members also benefit individually from the consumption of wild meat that is distributed throughout the community from hunted animals. This benefit, although nonfinancial, is typically viewed as a strong and very direct link between the value of having wildlife on communal lands and the members' livelihoods and well-being (NACSO 2013). To quantify the magnitude of these financial flows from hunting and tourism to stakeholders within communities, we used a subset of conservancy data from 2011 to 2013, during which time detailed financial accounting statements were used to track incoming conservancy revenue.

To simulate how a trophy hunting ban would affect the viability of communal conservancies in Namibia, we used detailed financial statements that were available for a subset of 50 conservancies in 2013 (all but two of the 52 conservancies that generated some level of benefits in 2013) and tabulated the operating costs each conservancy accrued. We then simulated the effects of a ban by removing all cash income that conservancies earned from trophy hunting in 2013 (assuming this cash income could not be substituted by increases in tourism) and calculated the difference in the proportion of conservancies that were able to cover their operating costs based on conservancy income under the status quo versus under a trophy-hunting ban. For comparison's sake, we removed all conservancy income from tourism and assessed how this changed financial viability of conservancies. We also used data on harvested animals and nationally averaged trophy prices to estimate the contribution of individual wildlife species to trophy hunting income.

Finally, for each conservancy we split total benefits over time into 2 series, one for hunting and one for tourism (Supporting Information). We characterized

these financial time series by calculating 4 metrics per conservancy: temporal trend (slope from a linear regression of benefits on year); volatility (root mean square error from the linear regression); end point (magnitude of benefits in 2013); and lag time between year conservancy registered and year the first benefits were generated.

We used *t* tests on these metrics to assess whether temporal flows of benefits to conservancies were significantly different between hunting and tourism.

Results

Of the 77 conservancies established by 2012, 25 reported not generating any benefits from either hunting or tourism. Considering all conservancies in Namibia's CBNRM program, aggregate benefits increased over time (Fig. 1). Total benefits from tourism and hunting were similar in the early years of the program, but tourism benefits exceeded those from hunting from 2003 to 2010, whereas from 2011 to 2013 the benefits from hunting were greater than tourism benefits (Fig. 1a). Although fee payments to conservancies and nonfinancial benefits (primarily meat) from hunting accumulated at higher levels than those from tourism (Figs. 1b and d), total salaries from tourism enterprise jobs increased 10 times faster than salaries from hunting jobs (Fig. 1c). Nonfinancial benefits from tourism dropped sharply from 2011–2013 relative to continued increasing nonfinancial benefits from hunting (Fig. 1d), a result that may have coincided with the worldwide economic downturn in 2008 and fewer available resources for tourism companies to make additional contributions to conservancies.

Conservancies were formed in roughly 4 cohorts that coincided with (1) initial heavy donor investment (1998–2001, 15 conservancies), (2) a period of declining donor investment (2003–2005, 29 conservancies), (3) an upturn in investment peaking in 2009 (2006–2009, 15 conservancies), and (4) a further increased-investment phase (2011–2013, including 18 conservancies registered by the end of 2012). The earliest conservancies, in cohort 1, had similar levels of total benefits for the first 6 years after registration, after which benefits from both hunting and tourism continued to increase but at a faster rate for tourism (Fig. 2a). Conservancies in cohort 2 (Fig. 2b) had roughly similar rates of growth in total benefits from tourism and hunting, whereas cohorts 3 (Fig. 2c) and 4 (Fig. 2d) earned virtually no benefits from tourism and had either moderate (cohort 3) or low (cohort 4) benefits from hunting.

Disaggregating the national-level data revealed that pathways for generating benefits over time varied substantially among conservancies (Supporting Information). Of the 52 conservancies that derived some level of benefits from wildlife, 28 derived all or almost all of their total benefits from hunting, 6 derived all or almost all benefits from tourism, and 18 had substantial levels of benefits from both hunting and tourism.

Although there was a tendency for the total benefits from tourism to be higher than those from hunting, there were no significant differences for any of the conservancy time series metrics (Table 1). The only exception to this was the lag time between conservation formation and the beginning of benefits generation. After their formation, conservancies derived benefits from hunting approximately twice as quickly as they derived benefits from tourism (Table 1). On average, conservancies started generating benefits from hunting about 3 years after their formation, whereas it took 6 years, on average, after conservancy formation to start generating benefits from tourism.

In addition to temporal and spatial differentiation, there were differences in how benefits from tourism and trophy hunting flowed to the different constituencies contained within communal conservancies (Fig. 3). Based on detailed financial accounting data from 2011–2013, 58.3% of the financial benefits from tourism were in the form of jobs to conservancy members at joint-venture lodges, whereas 30.3% of the benefits were lodge contractual fees used for conservancy management and 11.5% were nonfinancial benefits to the community at large less.

In contrast, the majority (64.3%) of the benefits from hunting were in the form of cash for the operation of the conservancy, and a substantial fraction went to the community at large in the form of meat from hunted animals (32.0%, or approximately 1.4 million kg over the 3 years). Conservancies used income from trophy hunting and tourism in a variety of ways that benefited the entire community (Fig. 3), most importantly for the salaries of conservancy employees and for other conservancy operating costs, but also for compensation for wildlife conflict, payments to traditional authority structures, direct cash dividends, community-level projects, and infrastructure development. Our data suggest that operational costs, conservancy employee salaries, and the various benefits to the community at large were mostly derived from hunting because hunting operators paid fees from 2011–2013 of $5.41 million (72% of the total), whereas tourism operators paid $2.13 million (28%).

Currently, many conservancies cover their operating costs with income derived from trophy hunting and from tourism that is directed to conservancy management. Simulation of a trophy hunting ban showed a reduction in the number of conservancies with incomes greater than operating costs in 2013, from 74% (37 of 50) under the status quo to 16% (8 of 50) when conservancy income from hunting was eliminated. If this reduction were to occur throughout the country, it would cover nearly 50,000 km^2 (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

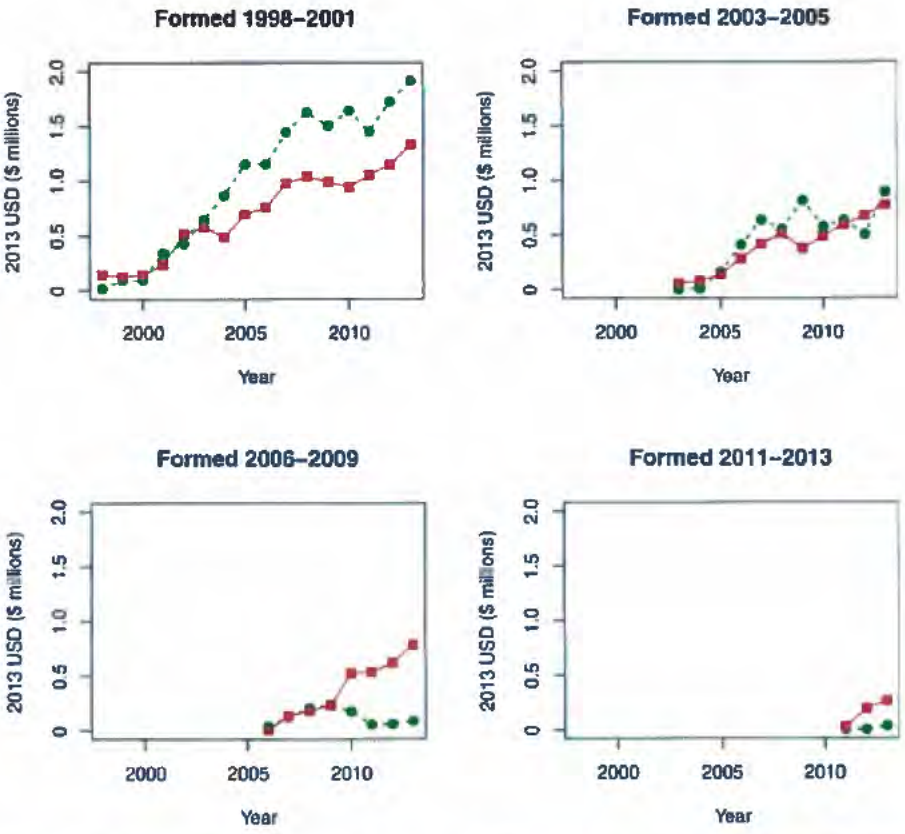

Figure 2. Total benefits from 1998–2013 for hunting (squares) and tourism (circles) across conservancies formed in 4 periods: (a) 1998–2001 (n = 15), (b) 2003–2005 (n = 29), (c) 2006–2009 (n = 15), and (d) 2011–2013 (n = 18).

Table 1. Statistical differences among time series of different metrics of total benefits (in U.S. 2013 dollars) generated from trophy hunting versus tourism on communal conservancies ($n = 52$) in Namibia.*

Variable	*Hunting*	*Tourism*	*t*	*P*
Benefits in 2013 (U.S.$ 2013)	41,453	56,255	−0.91	0.36
Trend (linear regression) of annual change (U.S.$ 2013)	2458	3954	−1.39	0.17
Volatility (root mean square error) of change over time (U.S.$ 2013)	79,192	82,501	−0.16	0.83
Average annual gain (U.S.$ 2013)	8723	11,175	−0.93	0.36
Maximum annual gain (U.S.$ 2013)	47,420	68,694	−1.19	0.23
Lag (years) between conservancy formation and first benefits	2.81	5.71	−3.29	0.001
Number of conservancies specializing in hunting or tourism	28	6	—	—

**Excluding conservancies that had not generated any benefits from either hunting or tourism.*

Figure 3. The flow of benefits to various sectors of a stylized local community in Namibia (widths of arrows proportional to dollar values of flows to conservancies from 2011 to 2013; brown, hunting benefit; green, tourism benefit; olive green, flows with a mix of hunting and tourism benefits; dashed rectangle, reinvestment of income into conservation activities; JV, joint venture tourism; HWC, human wildlife conflict; TA, traditional authority). Specific stakeholders (blue ovals) and the overall community at large receive the benefit flows indicated by the arrows ending in those ovals. Income to the conservancy committee (black rectangle) comes from both sectors and is redistributed as indicated, including to cover conservation operating costs (red square).

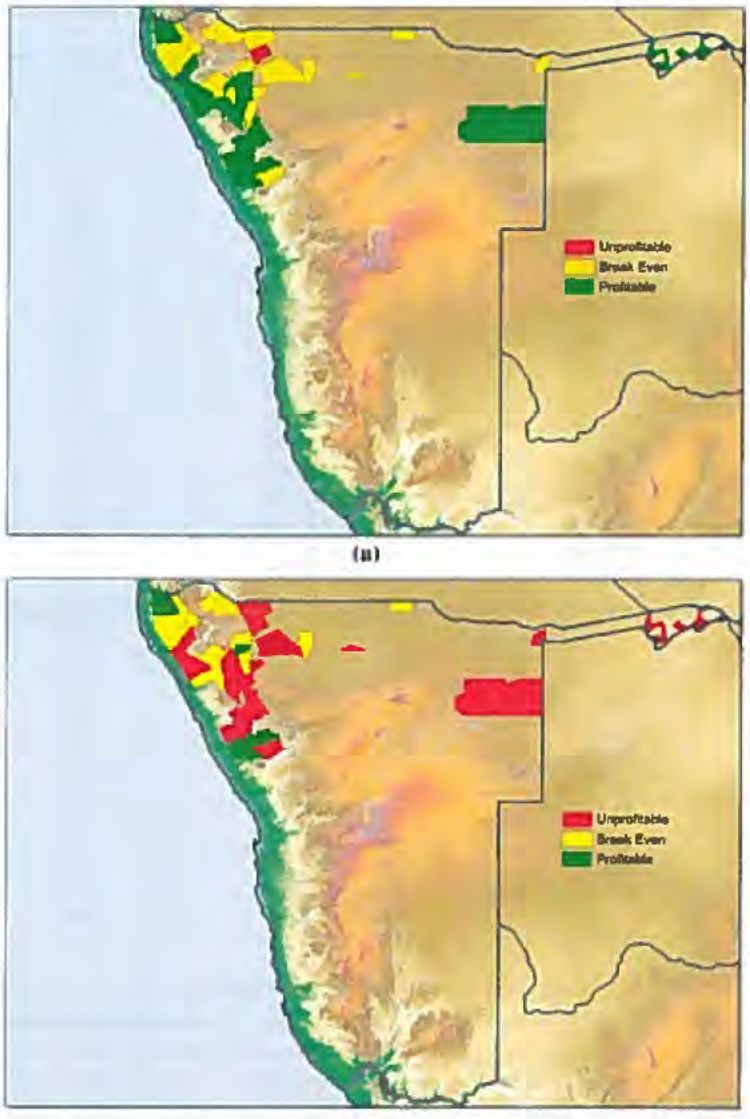

Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within $5000 of one another.

less marked; 59% of conservancies remained able to cover their operating costs.

Finally, of the 303 animals harvested by trophy hunters in 2013, individuals from 2 of the Big-5 (buffalo [*Syncerus caffer*], elephant [*Loxodonta africana*], lion [*Panthera leo*], leopard [*Panthera pardus*], rhinoceros [*Diceros bicornis* and *Ceratotherium simum*) species hunted in Africa, buffalo and elephant, accounted for 78.3% of hunting revenue; over 55% was attributable just to elephants (Table 2).

Discussion

Despite the importance of both tourism and hunting to conservation, and the debate surrounding their implementation, we are the first study to use detailed quantitative data across multiple jurisdictions and over a lengthy time span to directly compare the financial performance of these two activities. Our data from 77 Namibian conservancies from 1998 to 2013 showed that trophy hunting and tourism reached similar aggregate levels but began to generate benefits at different times (earlier vs. later in a conservancy's life-span) and flowed to different beneficiaries (community management committees and the community at large vs. individual employees). Previous work in Namibia has demonstrated that benefits from hunting and tourism are also spatially differentiated; conservancies are more likely to generate benefits from hunting in areas with diverse wildlife and Big-5 species, whereas the presence of black rhinoceros (*Diceros bicornis*) and broader environmental conditions (distance to tourist routes, topographical diversity, and rainfall) are correlated with higher benefits from tourism (Naidoo et al. 2011*b*). In addition, the first conservancies established were typically those with the highest potential to

Table 2. Number of animals killed by trophy hunters in 2013, by species; average payment made per animal; and the estimated overall contribution of each species to trophy hunting income on communal conservancies in Namibia.

Species	*Animals hunted*	*Payment per animal (2013 U.S.$)*	*Revenue (2013 U.S.$)*	*Percentage of total*
Baboon	17	25.62	435.58	0.03
Black-backed jackal	6	23.65	141.91	0.01
Black-faced impala	8	723.55	5788.38	0.3
Blue wildebeest	12	382.26	4587.14	0.3
Buffalo	71	5497.93	390,352.70	23.4
Burchell's zebra	22	388.69	8550.10	0.5
Bushbuck	1	746.89	746.89	0.04
Common impala	22	180.91	3980.08	0.2
Crocodile	22	1321.06	29,063.28	1.7
Common duiker	5	116.18	580.91	0.03
Elephant	69	13,296.47	917,458.09	54.9
Gemsbok	60	274.79	16,490.46	1
Giraffe	7	677.80	4744.50	0.3
Hartmann's mountain zebra	67	356.54	23,887.76	1.4
Hippopotamus	31	2068.26	64,117.43	3.8
Klipspringer	9	282.88	2546.27	0.2
Kudu	55	449.38	24,718.57	1.5
Red lechwe	13	1190.35	15,474.59	0.9
Leopard	11	2210.79	24,318.88	1.5
Lion	2	11,371.89	22,743.78	1.4
Ostrich	14	102.49	1435.17	0.1
Reedbuck	3	591.29	1773.86	0.1
Roan antelope	9	4385.68	39,470.95	2.4
Sable antelope	9	5290.46	47,614.11	2.8
Spotted hyena	5	297.30	1486.41	0.1
Springbok	89	154.56	13,756.85	0.8
Steenbok	10	89.73	897.61	0.1
Warthog	17	187.03	3179.46	0.2
Waterbuck	1	1037.34	1037.34	0.1
Totals	667	—	1,671,379.05	100

generate benefits from wildlife, and, as with our cohort results, older conservancies generate higher levels of aggregate benefits than younger ones (Naidoo et al. 2011*a*; Humavindu & Stage 2015).

We found that tourism and hunting both made substantial and separate contributions to the economic welfare of rural communal residents; the former was weighted toward employment and wages and the latter toward governance structures and management costs. A focus on either one or the other would lead to substantial reductions in overall benefit generation and incentives for wildlife conservation throughout Namibia. For much of Africa and other parts of the world, Westerners tend to view tourism as the dominant wildlife-based development paradigm for delivering a sustainable flow of benefits to local communities living with wildlife or near protected areas (Kiss 2004; Hawkins & Mann 2007). Similar to the results of studies of private landholders (Lindsey et al. 2013*b*) and national economies (Barnes et al. 2002; Lindsey et al. 2007), our results showed it is important to recognize that the direct benefits of hunting are roughly similar in magnitude to those of tourism for communal conservancies in Namibia.

Beyond this aggregate overall similarity between the benefits of hunting and tourism, there are important differences in scale and sequencing between the two activities. For the typical conservancy, benefits from hunting are generated quickly, within a few years of formation. In these early years of a conservancy, income from trophy hunting is critical for the management of the area, and the meat from hunted animals makes tangible the economic benefits that wildlife conservation can deliver to conservancy members. Benefits from tourism take twice as long to develop, due to the time needed for the recovery of wildlife populations, and the investments in both physical (i.e., lodges and other infrastructure) and human capital required to host high-end tourism in communal areas. Few conservancies (12%) specialized in tourism; most conservancies generating benefits from tourism also generated benefits from hunting. In contrast, over half (54%) of the conservancies generating benefits in Namibia did so from hunting alone, because hunting can be sustained in areas with relatively low densities or visibilities of wildlife, and in landscapes that are unappealing or inaccessible for photographic tourism (Lindsey et al. 2006). Because these conditions characterize much of the African protected-(in the widest sense) area estate, it follows that preventing or discouraging trophy hunting would remove possible incentives for conservation across a large swathe of the continent

where nature-based tourism is not viable (e.g., Blom 2004).

Benefits from trophy hunting and tourism also accrue to different stakeholders within communal conservancies. Benefits from tourism were mainly in the form of employment income to conservancy members who are hired to work at lodges built on conservancy land. Although these employees normally come from among a group of conservancy members nominated by the conservancy, ultimately staff are hired based on their knowledge, communication skills, and potential. Jobs of any kind are extremely rare in remote rural areas and thus highly sought after; therefore, tourism is viewed very favorably by local residents who are employed in the industry (Suich 2010; Silva & Motzer 2015). In contrast, agreements between communities and hunting operators provide significantly higher levels of income for conservancy management, as well as greater nonfinancial benefits (largely from meat) distributed directly to the community at large.

The income to management committees is essential; without it, most communal conservancies in Namibia would be unable to cover their operating costs (which three-quarters of the 50 conservancies we assessed were doing). Conservancies unable to cover their operating costs will likely cease to pursue conservation as a viable land use because without conservancy income, game guards cannot be paid, management and monitoring plans cannot be developed and instituted, the sense of local ownership over natural resources dissipates, and wildlife becomes much more vulnerable to declines from poaching and overharvest. This link between income from hunting and the conditions and incentives that permit wildlife to persist as an economically viable land use is critical but often unrecognized. Our data also show that almost 80% of hunting benefits are delivered by two species (elephant and buffalo); elephants alone generate over 50% of all hunting benefits from an increasing population base (7500 individuals in 1995 to over 20,000 in 2012 [Craig 1999; Ministry of Environment and Tourism 2012]). Therefore, even a targeted hunting ban on elephants or an import ban such as those that currently prevent the import of elephant trophies from Tanzania and Zimbabwe into the United States is likely to have a very negative impact on Namibia's CBNRM program by severely undermining conservancy governance structures and incentives for conservation. Anecdotal accounts of the impact of Botswana's 2014 hunting ban suggests that similar negative consequences (an increase in poaching for meat and trade and increased collaboration of local communities with international poaching gangs) may be occurring there (Somerville 2015).

Although we found there were impressive financial gains from trophy hunting, the sustainability (both ecological and economic) of these operations on communal lands in Namibia is rightly of major concern. As such, it is regulated via annual estimates of species' populations and harvest quotas derived in agreement with local communities and the Ministry of Environment and Tourism (NACSO 2013). Although data from the various conservancy landscapes within the country indicate populations in these areas have generally increased since the advent of Namibia's CBNRM program (Naidoo et al. 2011*b*), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013*a*) means that trophy hunting must be carefully monitored in Namibia to ensure the same does not happen. There have been no assessments on how trophy size or quality in particular species may be changing over time, a concern that has been raised for trophy hunting in Africa (Crosmary et al. 2013) and that may result in undesirable genetic changes within hunted populations (Coltman et al. 2003). It is therefore critical that data on the size and quality of trophy exports be analyzed for Namibia's CBNRM program to inform monitoring, evaluation, and management of the trophy-hunting industry. High-profile, apparently illegal hunts such as of lions on the borders of national parks in Zimbabwe, and ethically dubious practices, such as canned hunting of captive animals, also illustrate that the industry itself must play a greater role in addressing issues that throw the sector into disrepute. Finally, growing human populations and a tremendous increase in elephant poaching for the international ivory market may eventually result in reduced quotas of elephants and therefore threaten the financial benefits communal conservancies have generated through trophy hunting.

The sustainability of photographic nature-based tourism in Africa and beyond has also come under scrutiny (Buckley 2004; Newsome et al. 2012). In Namibia relevant issues for ecological sustainability include impacts of intense wildlife viewing on animal behavior, localized environmental implications of the development of tourism infrastructure (lodges, campsites, roads, disposal facilities, etc.) in sensitive arid environments, and climate-change impacts from the carbon emissions of increasing numbers of international visitors. As with trophy hunting, there are few studies, particularly for the first two considerations, that have evaluated the sustainability of tourism initiatives on communal conservancies in Namibia. Furthermore, from a socioeconomic point of view nature-based tourism on communal lands in Namibia has been criticized as having power imbalances or elite capture issues that render communities unable to secure significant shares of the benefits (Hoole 2010; Lapeyre 2011), even though residents of conservancies with high benefit levels are themselves strongly supportive of tourism (Silva & Motzer 2015). Finally, to assess more fully the overall costs and benefits of wildlife conservation on communal lands in Namibia, there is a need for greater investigation of both human-wildlife conflict costs and who bears them, as well as the opportunity

costs of pursuing wildlife conservation as a land use versus alternative uses.

Despite these caveats, our results show that hunting and tourism generated similar aggregate levels of benefits for local communities in Namibia. Because these benefits occur at different times, in different places, and reach different sections of local communities, each are essential to the successful functioning of community-based natural resource management in Namibia. As with other contexts (Sandbrook & Adams 2012), recognizing that benefits from conservation to local communities take various pathways has important implications for conservation and the development of effective incentives. Further investigation is therefore desperately needed to examine the relative impacts of hunting and tourism in many others areas of conservation importance in sub-Saharan Africa.

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Supporting Information

The total benefits over time from hunting and tourism for each of Namibia's 52 communal conservancies formed by 2012 that have generated some level of benefits (Appendix S1) is available online. The authors are solely responsible for the content and functionality of these materials. Queries (other than absence of the material) should be directed to the corresponding author.

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African Elephant Status Report 2016

An update from the African Elephant Database

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Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Namibia

ESTIMATED TOTAL ELEPHANTS

22,754 ± 4,305

GUESSES

90 - 90

GENERAL STATISTICS

Country Area	825,418 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

NUMBERS AND DISTRIBUTION
CONT.

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the Hoarusib and Hoarusib dry riverbeds reduced from 42 to 31 between 2002 and 2015 (Ramey & Brown, 2015).

There are occasional sightings of elephants in livestock ranching areas to the south of their normal range in the area north and east of Windhoek. These are shown as point records on the range map (Hartman, 2014; The Namibian, 2014).

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CI	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CI	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	DESIGN	YEAR	ESTIMATE	SE/CI			(km²)	LON	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque, pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 2015b	1	17,473	23.5°E	17.9°S

*RANGE OF INFORMED GUESS

*KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— No Change

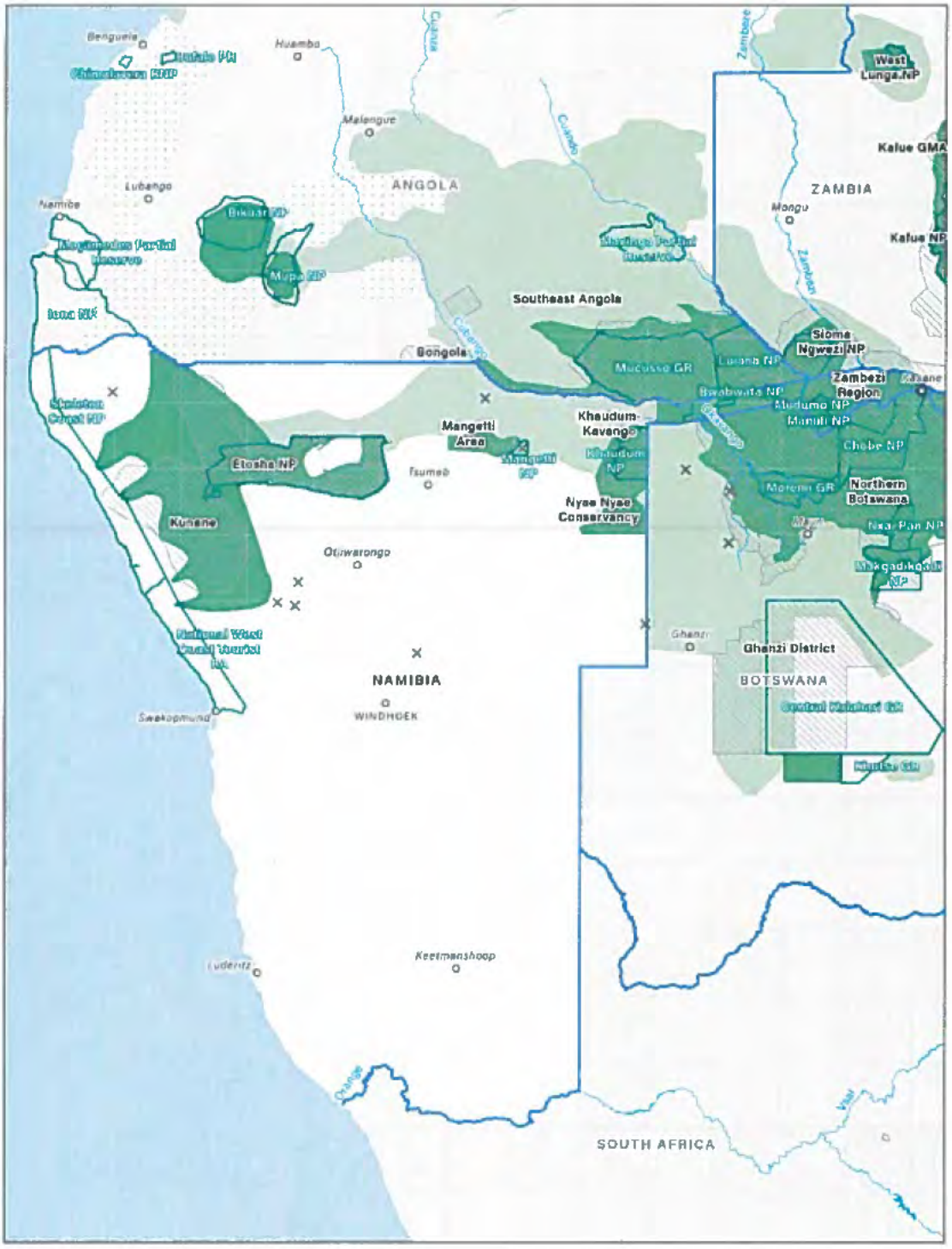
*KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Namibia



ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

AfESG

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Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

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Windhoek
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officemanager@nacso.org.na

Salambala Conservancy

Named after the lovers Sala and Bala whose illicit relationship resulted in them being banished to the forest

Quick facts

Registered:	June 1998
Region:	Zambezi
Area:	930 km²
Approximate population:	8,553
Geographical features:	Average annual rainfall of 600 mm. Mopane woodland dominates the northern area, while floodplain grasslands cover the southern section.
Particular features:	

Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

Elephant in Zambezi region

NACSO full members

IRDNC

LAC

NDT

CCF

MRCC-UNAM

» See all NACSO members

NACSO partners

Funding partners

Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...

Website by JARO Consultancy

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2016 Annual Conservancy Audit Report

Salambala
Status Summary & Natural Resource Report

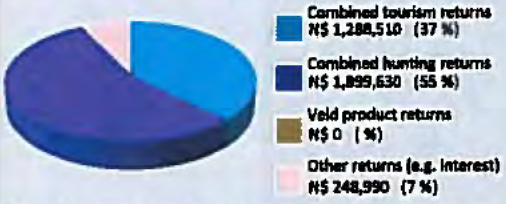
maximising wildlife returns by minimising threats...

Conservancy status summary

Returns from natural resources in 2016

the chart shows the main sources of returns and values and their percentage of the total returns

Approximate Total Returns N$ 3,437,130



Two of the most significant returns for the conservancy:
- ✓cash income to the conservancy to cover running costs and invest in developments
- ✓Employment to conservancy residents

Conservancy income			N$ 2,006,450
Employment	Private Sector	52 staff	N$ 1,302,080
	Conservancy	37 staff	N$ 1,071,460

Cost of natural resource conflicts in 2016

estimates are based on average national values

Estimated human wildlife conflict cost	N$ 49,970
Estimated poached high value species loss	N$ 0
Total conflict cost estimate	**N$ 49,970**

Natural resource cost--return ratio in 2016

the chart shows the approximate ratio of returns to costs

Natural resource returns outweigh approximate conflict costs

Total returns: N$ 3,437,130

Approximate conflict costs: N$ 49,970

Approximate positive ratio 69 : 1

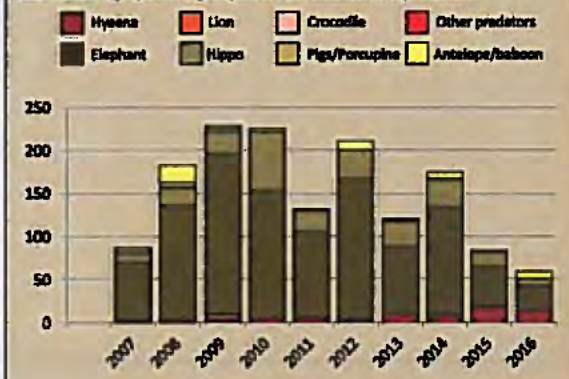
Management performance in 2016

Category	Performance
1 Adequate staffing	
2 Adequate expenditure	
3 Audit attendance	
4 NR management plan	
5 Zonation	
6 Leadership	
7 Display of material	
8 Event Book modules	
9 Event Book quality	
10 Compliance	
11 Game census	
12 Reporting & adaptive mment	
13 Law enforcement	
14 Human Wildlife Conflict	
15 Harvesting management	
16 Sources of NR income	
17 Benefits produced	
18 Resource trends	
19 Resource targets	

Human wildlife conflict

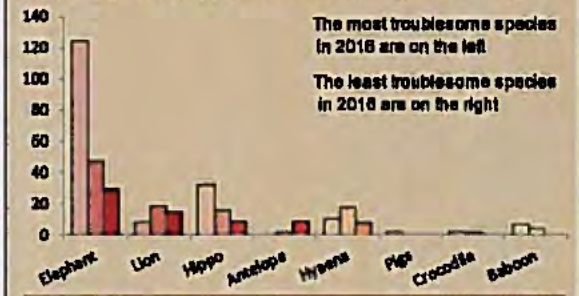
Human wildlife conflict trend

the chart shows the total number of incidents each year, subdivided by species, grouped as herbivores and predators



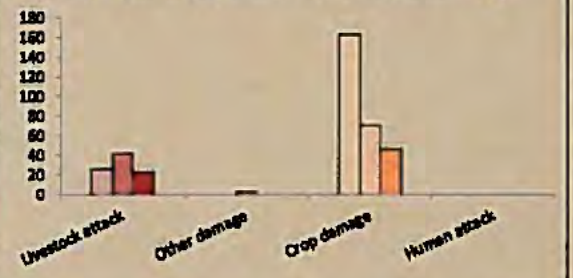
Most troublesome problem animals 2014-2016

the chart shows the number of incidents per species for the last 3 years; the darkest bar (on the right) indicates the current year for each species



Type of damage by problem animals 2014-2016

the chart shows the number of incidents per category for the last 3 years; the darkest bar (on the right) indicates the current year for each type



Poaching

Number of Incidents per year

Commercial poaching is a serious threat to conservancy benefits. The chart shows the number of incidents per category

Traps and firearms recovered

number of incidents per category

Arrests and convictions

number of incidents per category

Wildlife removals – quota use and value

Species	Quota 2016			Animals actually used in 2016						Potential Trophy Value N$	Potential Other use Value N$
	Total	Trophy	Other Use	Trophy	Own Use & Premium	Shoot & Sell	Capture & Sale	Problem Animal	Total Use		
Baboon	2	2		1					1	500	
Buffalo	4	3	1	2	1				3	70,000	5,500
Crocodile	2	2		2					2	25,500	
Elephant*	11	6	5	6	4				11	200,000	450,000
Hippo	5	2	3	2	2			1	6	25,000	5,500
Hyaena	1	1								5,000	
Impala	25	10	15	3					3	2,700	680
Kudu*	6	2	4		3				3	5,000	19,400
Warthog	13	3	10	2	3				5	2,200	400
Waterbuck*	2	2		2	4				6		
Blue Wildebeest*	11	3	8	2	7				9	3,800	29,800
B. Zebra	40	10	30	8					8	3,500	3,500

Salambala

Natural Resource Report continued...

Not all data or species are shown on this report; use your Event Book for more information

monitoring numbers and trends for a healthy conservancy...

Current wildlife numbers and status

Species	Animals Seen	Estimate	Wildlife Status: Count Trend	Wildlife Status: National Guideline	Wildlife Status: Desired Number
B. Zebra	338	350			
Duiker	2	250			
Elephant	57	?			
Giraffe	12	?			
Impala	173	?			
Kudu	28	240			
Roan					
Sable					
Steenbok					
Warthog	37	1000			

Wildlife Status

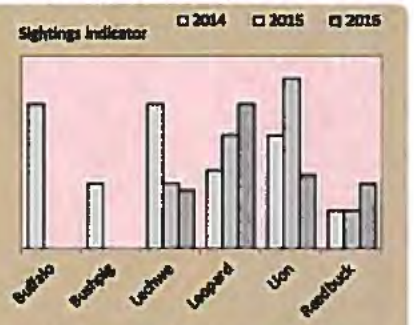
Count trend – gives the species status in the conservancy based on game count trend data.

National guideline – gives the species status in the conservancy using national guidelines for the conservancy; for example, lions may cause local problems, but are of high value and are rare at landscape level.

Desired number – gives the species status in the conservancy based on what the conservancy would like to have.

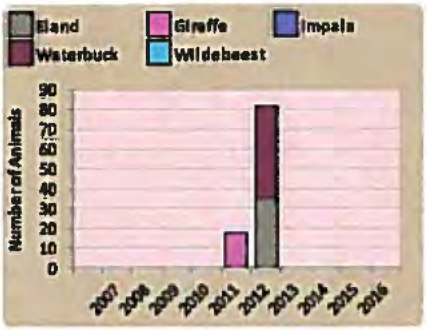
dark green (abundant) – there should be less;
light green (common) – the desired number is reached;
yellow (uncommon) – there should be more;
light orange (rare) – there should be more than double;
dark orange (very rare) – there should be more than triple;
red (extinct) – the species needs to be reintroduced.

Locally rare species

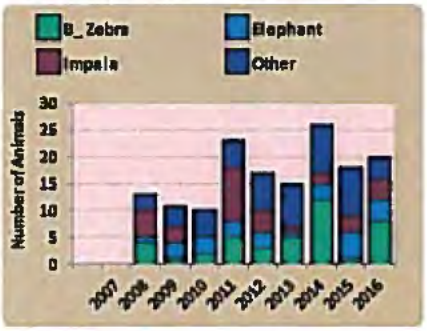


Locally rare and endangered species are not found very often in the conservancy and need special conservation attention.

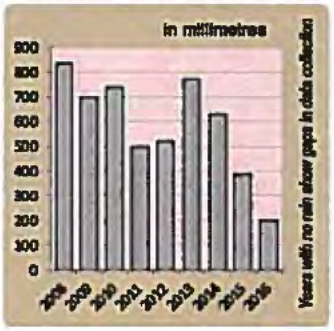
Wildlife introductions



Wildlife mortalities

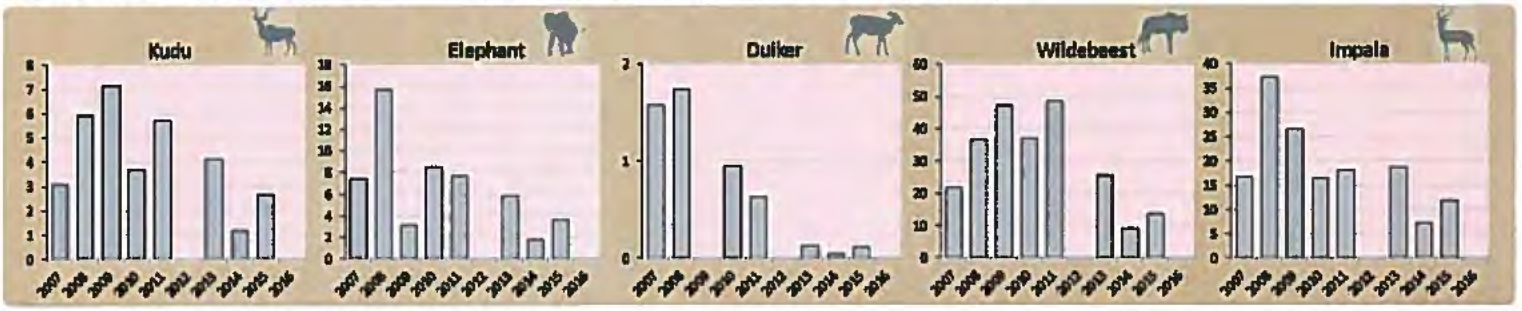


Annual rainfall



Fixed route patrols

charts show the number of sightings of each species per fixed route foot patrol each year



Predator monitoring

charts show the average number of animals seen per Event Book each year
status barometers reflect the general sightings trend over the last 5 years

Vegetation monitoring

Fire monitoring

2016 Annual Conservancy Audit Report

Salambala Institutional Report

Not all institutional data are shown on this report: use your governance institution audit for more information

Enabling wise conservancy governance...

Conservancy statistics

Date Registered:	June 1998
Population (2011 census):	8240
Size (square kilometres):	930

Constitutional adherence

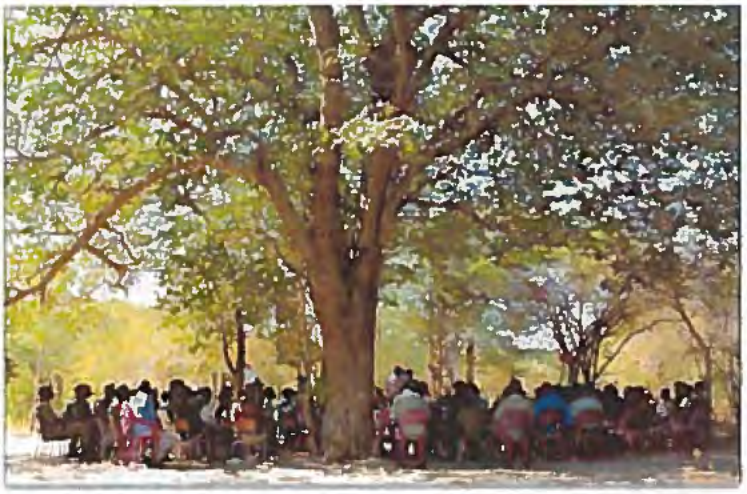
Approved constitution	✔
AGM held	✔
Management and utilisation plan	✔
Financial annual report approved at AGM	✔
Financial report external review	✘
Benefit distribution plan	✔

Conservancy Governance

Number of management committee members:	35
Date of last AGM:	Fri, December 2, 2016
Attendance at AGM:	Men: 82; Women: 59
Date of next AGM:	

Other important issues

Budget approved?	✔
Work plan approved?	✔



Employment

Conservancy staff: Male	27
Female	10
Community game guards:	20
Community resource monitors:	1
Lodge staff: Male	0
Female	0

Benefits

Cash	In Kind
Traditional Authority	
Community Projects	Cash Distribution
Other Benefits	Meat Distribution
Hascia	Social Benefits
Hwc Offset	

Conservancy Self Evaluation How well does the conservancy consider it has performed in the past year?

Effectiveness of implementation	Poor	Fair	Good	Explanation of effectiveness rating
Game Management and Utilisation				Poaching incidents minimised. Increased wildlife.
Zonation Plan				Some members are still settled in core areas and wildlife corridors.
Benefit Distribution				People have recognised the importance of wildlife and they are moving to implement capital projects.

(b) (6) [redacted]

Fidelity Account® (b) (6) [redacted]

4/25/2018
Date

Pay to the Order of USFW

$100 00

One Hundred
Dollars

Fidelity INVESTMENTS
UMB Bank, N.A.
Kansas City, MO

For ELEPHANT IMPORT - NAMIBIA

(b) (6) [redacted]

Harland Clarke

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
(Appendix I of CITES and/or ESA)

RCVD MAY 22 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
McGinnis	Michael	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (See instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lynchburst	VA	(b) (6)		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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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 signature (mm/dd/yyyy) 3/28/18

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, Felidae family

   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:

      N/A

   b. Date wildlife is to be 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 See #3

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):

      ZIMBABWE, MASHONALAND WEST, RIFA SAFARI AREA, HURUNGWE CONCESSION (S16119 B2E029)

   b. Date wildlife was hunted:

      20 MAY 2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
SKIN (LIFE SIZE MOUNT WITH CLAWS); SKULL

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]:
TROPHY CONSULTANTS INTERNATIONAL (T.C.I)

4 JOSIAH CHINAMANO ROAD, BELMONT, BULAWAYO, ZIMBABWE

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

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.
See US Dept of Interior document of 06/11/2017.

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: 3/28/18

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):
Michael McInnis
(b) (6) [redacted]
(b) (6) [redacted]

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.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA

OCT 11 2017

Memorandum

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for Lions Taken as Sport-hunted Trophies in Zimbabwe during 2016, 2017 and 2018

After evaluating the available information from the Government of Zimbabwe, other information available to the U.S. Fish and Wildlife Service (Service), and comments received from interested parties, the Service has determined that permits for the importation of sport-hunted trophies of wild lions (*Panthera leo melanochaita*), which are threatened under the Endangered Species Act (ESA), taken in Zimbabwe during the 2016, 2017, and 2018 calendar years meet the enhancement criteria under the Service's regulations at 50 CFR 17.32. Therefore, applications received for import of such specimens will be considered to have met this requirement. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized. The Service will reassess the situation in Zimbabwe towards the end of the 2018 season to determine if hunts conducted in 2019 and beyond continue to meet the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the ESA was warranted and proposed a rule under section 4(d) of the ESA to provide conservation measures for the African lion. 79 Fed. Reg. 64472. On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the ESA) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under section 4(d) of the ESA, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion

subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the ESA and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the ESA to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service has the discretion to make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, although individual import permits will be evaluated and issued or denied for each application. While the Service may make enhancement findings for sport-hunted trophy imports of *P. l. melanochaita* on a countrywide basis, the Service encourages the submission of information from individual applicants. We rely on the information available to the Service and may rely on information from sources other than the applicant when making a permitting decision.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits (50 CFR 17.32(a)(2)) , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies.

Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In that review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service will evaluate any application received that involves *P. l. melanochaita* in the context of enhancement of propagation or survival permitting in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Endangered Species Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not

perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

When evaluating whether the importation of a trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we will examine how a country's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32, we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter's participation in the hunting program contributes to the overall management of lions within a country.

Management programs for *P. l. melanochaita* are expected to address, but are not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we will work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program would provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding for Lions in Zimbabwe:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC)*

Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the

CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for the present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA's mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation

area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the ESA, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach et al. 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward et al. 2007). Outside of protected areas, the lion's prey base is much reduced (du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations

also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96% of the all national parks) and safari areas (92% of all safari areas). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lion are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014 used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (pg.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the

only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on the each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the ESA for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The

quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "(t)he costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implement a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari-hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural

communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests average 2.7% of adult male lions annually. This percentage has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe, were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further,

according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five-year terms, and how these concessionaires pay a five-year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore,

sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016), only 16 are actively engaged in some form of wildlife-based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015).

As agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 and 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters accounted for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport hunters conduct lion hunts in these areas; if so, the Service is not aware if sport hunters are exempted from the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account

fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria based on information available to the Service, we have been able to determine that sport-hunted lion trophies taken in 2016 and 2017 would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport-hunting market in BVC and SVC during 2005-2015. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to local communities, which incentivizes them to conserve the African lion. In the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted;

ZPWMA (2016) reports that the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of SVC from cattle to wildlife (du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. Although U.S. hunter participation in lion hunts is not enough to make or break the industry, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term negative impact.

Further, through the *Strategy and Action Plan*, Zimbabwe has put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, and revise our finding as appropriate.

Therefore, based on the information available to the Service. and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit being requested is adequate to justify removing lions from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million

hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserve the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge et al. 2007, Whitman et al. 2004).

Based on the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based quota-setting process. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounted for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions with in Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continue to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of import permits for legally hunted lions does not conflict with known conservation programs and rules.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the current status of lions within Zimbabwe and the level of management and oversight provided to them, the Service is able to find that the harvest and import of sport-hunted trophies of lions within Zimbabwe meet the purposes of the ESA. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe and the Service will reassess lion management within Zimbabwe and whether the importation of sport-hunted trophies enhance the survival of the species at the end of the 2018 hunting season or at which time substantive information becomes available to the Service in the interim.

Although the Service is able to make a finding that the management of lions within Zimbabwe meet the enhancement criteria under the ESA, there are certain documents and data the Service needs to evaluate in order to continue our current finding past the 2018 hunting season. The Service expects to be able to review data from the 2016, 2017, and 2018 hunting seasons to assess the lion populations and ensure that management efforts are enhancing the propagation and survival of the lion within Zimbabwe. Given that Zimbabwe's last management plan for lion was produced in 2006, the Service would like to see an updated plan established. Local management plans, such as the Management Plan for Hwange National Park will be sought. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will seek updates on further progress of the outputs or targets not yet accomplished. Lastly, the Service will also seek an update on the quota setting process. Specially, we will need further information on the establishment and implementation of precautionary quotas.

Therefore, with the information currently available to the Service, the Service is able to make a determination that the import of lions taken in Zimbabwe in 2016, 2017 and 2018 would meet the issuance criteria under 50 CFR 17.32. In accordance with the 4(d) rule for *P. l. melanochaita*, 50 CFR 17.40(r), the Service will review each application received for import of such specimens on a case-by-case basis and each application will also need to meet all other applicable permitting requirements before it may be authorized.

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MEMO

Michael J McGinnis

AUTHORIZED SIGNATURE

(b) (6)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/92335C

Enhancement Finding
Applicant: Michael (b) (6) McGinnis (b) (6) (PRT – 92335C)

Michael (b) (6) McGinni (b) (6) submitted an application on May 22, 2018, for the importation of one male lion (*Panthera leo melanochaita*) taken from Mashonaland West, RiFa Safari Area, Hurungwe, Zimbabwe, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken during May 20, 2017, from this population meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive,

carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinient to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zinmbabwe.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. McGinnis' application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance

with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.
>
> (b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and

other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. McGinnis' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider

include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. McGinnis' participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA

regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-

funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species

can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and

international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being

implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge *et al*. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo*

in Zimbabwe ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;

4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities

each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (Du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the status of lions within Zimbabwe at the time Mr. McGinnis' conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. McGinnis' sport-hunted trophy taken in Zimbabwe on May 20, 2017, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. House conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Michael Joseph McGinnis, Jr. of Lyndhurst, Virginia.**

6/9/18

Anna Barry, Acting Team Leader
Branch of Permits
Division of Management Authority

6/8/2018

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZIMBABWE ESA TROPHY

Permit Number: MA92335C-0
Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coghlan
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
MICHAEL (b) (6) MCGINNIS (b) (6)
LYNDHURST, VA (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zimbabwe 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.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2017 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.

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.

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).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RCVD JUN 01 2018

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Abbott	Marsha	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
McGehee	Arkansas	(b) (6)		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
McGehee	Arkansas	(b) (6)		USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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.

Marsha Abbott — 05/18/2018

Signature of applicant/Principal Officer 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: 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.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo melanochaita, 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:
   Zambia, Chanjuzi GMA, Eastern Province.
   nearest city is Lusaka, nearest town is Lundazi

   b. Date wildlife is to be hunted: June 3-July 4, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Muchinga Outfitters, Impanga Safaris Ltd. Lusaka, Zambia

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:

   b. Date wildlife was hunted:

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

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]:

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).

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:
   Business Name: Impanga Safaris
   Address: P.O. Box 31012
   City: Lusaka
   State/Province:
   Country, Postal Code: Zambia

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?

   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?

   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

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: Paula Abbott Date: 5/18/18

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).

(b) (6)
(b) (6)
May 18, 2015
Date
Pay To The Order Of U.S. Fish and Wildlife Service
$ 100.00
Dollars
FIRST NATURAL STATE BANK
MCGEHEE, ARKANSAS
For
(b) (6)
MP

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93468C

Enhancement Finding
Applicant: Marsha (b) (6) Abbott (PRT-93468C)

Marsha (b) (6) Abbott submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken July 3, 2018, or July 4, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Ms. Abbott's application involving a *P. l. melanochaita* sport-hunted trophy taken in Chanjuz GMA, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Ms. Abbott's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Ms. Abbott's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Ms. Abbott's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Ms. Abbott's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Ms. Abbott will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Ms. Abbott in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Ms. Abbot.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to her to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Marsha (b) (6) Abbot.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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Permit Number: MA93468C-0
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
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Mary Coglianese
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
MARSHA (b) ABBOTT
(b) (6)
MCGEHEE, AR (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 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).

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 *(Panthera Leo Melanochiata)* 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: Richard Papapietro (b) (6)

Date: 5/15/19

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Papapietro	Richard	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number
(b) (6)		

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 #; no P.O. Boxes)				
(b) (6)				
1.c. City	1.d. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Henderson	NV	(b) (6)		USA

2.a. Mailing address (include if different than physical address; include name of				
Same				
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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.

05/15/2019

Signature of applicant/Principal Officer 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: 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.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo melanochaita (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:

Zambia - Sichifulo GMA. Nearest Town: Mulobezi. Latitude: 16.82944 Longitude: 25.49640

b. Date wildlife is to be hunted:

July 25 - August 11, 2018

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

Mulimo Safaris, Sichifulo GMA. Professional Hunter Greg Street

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:

b. Date wildlife was hunted:

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

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]:

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).

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:	Michael Borman
Business Name:	Bangweulu Taxidermy, Ltd.
Address:	4142/Chifwema Road
City:	New Kasama
State/Province:	Lusaka, Zambia.
Country, Postal Code:	

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?

Please see attached.

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?

Please see attached.

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

Please see attached.

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: _____ Date: 5/15/19

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).

Conservation Force v.5/3/18

Operator Enhancement Questionnaire

1. Name of area operator: MULIMO SAFARIS

   a. Years in business: 5

   b. Name of company conducting hunt: MULIMO SAFARIS

2. Name of concession: SICHIFULO GMA Size in km²: 3600

   a. Land tenure: __ Government lease X Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 10 YEARS Can it be renewed? X Yes ~~No~~

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   YES. ANTI POACHING, COMMUNITY OBLIGATIONS, EMPLOYMENT

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

   e. If the concession borders a national park, please provide the park name: KAFUE NATIONAL PARK.

   f. Description of general and distinctive habitat features and any water features:
   MIOMBO WOODLAND AND PLAIN.

3. Are there any communities living in the concession? ✓ Yes __ No

   a. If so, estimated number of people or villages in the concession? 1000

4. Are there communities bordering this concession? ✓ Yes __ No

   a. If so, estimated number of people or villages around the concession? 5000

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	AVG		UP	SIGHTINGS
Lion	AVG		UP	SIGHTINGS
Leopard	DENSE		UP	SIGHTINGS
Prey species	AVG		UP	SIGHTINGS

6. Total employment number: 30

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	1	1

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Trackers	2	2
Anti-poaching scouts/rangers	18	18
Other anti-poaching		
Cooks/housekeepers	1	1
Community coordinators	2	2
Managers		
Biologists		
Others: GENERAL STAFF	14	14

7. Number of staff employed in the off-season: 15

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	10	10	ALL YEAR
Managers			
Maintenance	5	5	ALL YEAR
Road opening/construction			
Community relations personnel			
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: +20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? BOTH

   c. Months during which anti-poaching patrols are conducted: ALL

   d. Number of anti-poaching patrols per month: 2 or 3

   e. Description of anti-poaching equipment, vehicles, etc.: RADIO EQUIPMENT / MOTORBIKES

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? OPERATOR AND GOVERNMENT

   g. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? _____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts		20 000 $	23000 $	
Equipment		15 000 $	10000 $	
Vehicles		10 000 $	15 000 $	
Petrol		2000 $	4000 $	

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Conservation Force
Operator Enhancement Questionnaire

Rewards paid		1000$	500$	
Other: _____				
Other: AIRLIFT			5000$	
TOTALS		48000$	55500$	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		20	15	
Ivory poachers arrested			4	
Meat poachers arrested		10	5	
Other poachers arrested		-	-	
Poachers convicted		5	2	
Snares/gin traps collected		300	100	
Firearms confiscated		4	4	
Vehicles confiscated		-	-	
Bicycles confiscated			4	
Boats/nets confiscated		3		
Tusks recovered		-	-	
Carcasses observed		4	3	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? ✓ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? BY CONTRACT AND VOLUNTARY.

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 50%.

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NO

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? N/A

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)		$1000.	$2000.	
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)		$2000		
Community scout salaries		$8500.	$8500	
Other community anti-poaching				
Local government activities				
Water infrastructure improvements		$3000		
Sports teams funded				
Construction materials donated			$6000.	
Other: Law Enforcement		$2000	$2000	
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)			
-- hunting lion		N/A	80%.
-- hunting elephant			
-- hunting leopard		ALL 100%	50%

12. Dollar amount and percentage of the company's revenue from U.S. clients: 80%

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: _____ Title: _____

[redacted] (6) (b)

90-7118 /413
3211

[redacted] (6) (b)

DATE 5/15/15

PAY TO THE ORDER OF USFWS $ 100.00

One hundred and 00/100 DOLLARS

citibank
CITIBANK, N.A.

Citi Private Bank

MEMO [redacted] (6) (b)

[redacted] (6) (b)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93474C

Enhancement Finding
Applicant: Richard (b) (6) Papapietro (b) (6) (PRT- 93474C)

Richard (b) (6) Papapietro (b) submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken from July 25, 2018, through August 11, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively,

except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import

of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Papapietro's application involving a *P. l. melanochaita* sport-hunted trophy taken in Sichifulo GMA, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Papapietro's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Papapietro's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Papapietro's application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Papapietro's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports

regulatory pathways in support of positive conservation outcomes. Zambia's lion management program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Papapietro will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Papapietro, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Papapietro.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Richard** (b) (6) **Papapietro.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA93474C-0
Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
RICHARD (b) (6) PAPAPIETRO (b)
(b) (6)
HENDERSON, NV (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 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).

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

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: Elder	1.b. First name: Chris	1.c. Middle name or initial: L	1.d. Suffix:
2. Date of birth (mm/dd/yyyy): (b) (6)	3. Telephone number:	3.a. Alternate telephone number:	4. E-mail address:

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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address): (b) (6)				
1.b. City: Springdale	1.c. State: AR	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. 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.

Chris Elder — 5-29-18

Signature of applicant/Principal Officer 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: 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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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.

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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 regular mail through the U.S. Postal Service.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   P.I. melanochaita (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:

   S. Luangwa, Zambia in Nyamvu, Nyimba closest town, operator Nyamvu & Mopane Saf

   b. Date wildlife is to be hunted: 7/27/2018-8/17/2018

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

   Ivory Safaris, Jeff Rann

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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).

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: Michael Borman
Business Name: Bangweulu Taxidermy
Address: 4142K Chifwema Rd, New Kasama
City:
State/Province: Lusaka Southern Zambia
Country, Postal Code: 50100

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

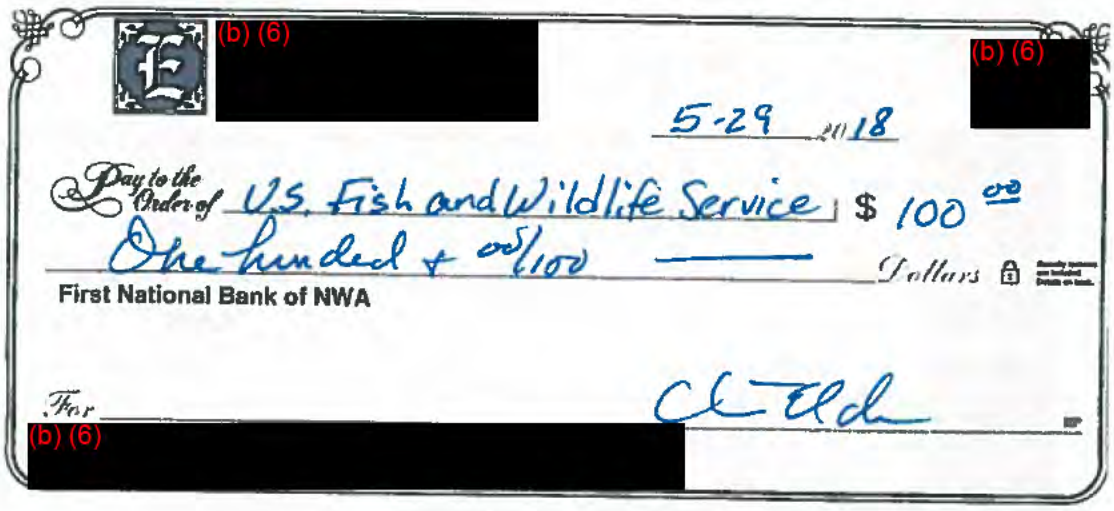
11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: _____

    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.

All international shipment(s) must be imported 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).



(b) (6)

(b) (6)

5-29 2018

Pay to the Order of U.S. Fish and Wildlife Service $ 100 00

One hundred + 00/100 Dollars

First National Bank of NWA

For

(b) (6)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-93561C

Enhancement Finding
Applicant: Chris L. Elder (PRT-93561C)

Chris L. Elder submitted an application on June 1, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken from July 27, 2018, through August 17, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the

prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Elder's application involving a *P. l. melanochaita* sport-hunted trophy taken in South Luangwa, Nyamvu, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
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> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
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> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Elder's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Elder's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Elder's application were the basis of this finding.

***Governance of Lions in Zambia*:**

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Elder's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Elder will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Elder, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Elder.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Chris L. Elder.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/18/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA93561C-0
Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
CHRIS L. ELDER
(b) (6)
SPRINGDALE, AR (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 maleAfrican lion (*Panthera leo melanochaita*) taken in Zambia 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 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 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).

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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January 28, 2019

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

RCVD FEB 8 2019

RE: Chris Elder's Notice of Representation, 93561C, Zambian Lion Import

Dear Chief Cogliano:

Enclosed is the original Notice of Representation allowing for Conservation Force to represent Chris Elder's Lion Permit application. The PRT for Mr. Elder's permit application is 93561C. This applicant has already taken his lion and filed his application more than a year ago. Can you please advise the status of his import application

Sincerely,

John J. Jackson III

encl:

- Chris Elder's Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

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: C- Elder

Name: Chris Elder

Date: 1-22-19

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD JUN 06 2018

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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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kirsch	PatricK	L	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Waconia	MN	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

Patrick L Kirsch 05/21/2018

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)?

   Patrick Kirsch

   (b) (6) [redacted]

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   LION , [redacted]

   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:

   Tanzania, East Africa. Hunting Block: M'barangandu Wildlife Managed Area

   b. Date wildlife is to be hunted:

   August 28, 2018 thru September 17, 2018

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

   Game Frontiers of Tanzania
   Plot 23, Kasanga Street
   Dar es Salaam, Tanzania

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:

   Not hunted yet

   b. Date wildlife was hunted:

   Not hunted yet

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

Not hunted yet

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]:

Not hunted yet

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). Have not hunted yet

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:
Business Name: Game Frontiers of Tanzania
Address: Plot 23, Kasanga Street
City:
State/Province: Dar es Salaam, Tanzania
Country, Postal Code:

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?

The professional hunter through whom I am hunting has hunted this area eve year for the past 8 years and reports seeing a number of male lions above th age of 6 years. He credits this to the thoughtful and successful game managem practices introduced in 2012. The benefits of which we see today.

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?

It is my understanding the govt. is paid $30,000.00 each year by Game Fronti for access to the hunting block with an additional $ 30,000 paid each year to local game department who manages and controls the hunting. In addition, the hunting company employs workers from the village (cont on pa she

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

The hunting company each and every year improves the hunting ar by grading roads, select and careful burning, construction of watering points, maintenance and expansion of springs, anti-poaching patrols and radio communication with government personnel and by conducting game surveys. It is essential to the (continued

Question 9B. Continued

and makes significant purchases of goods and services. The benefit to the local economy is substantial. Lastly, the hunting company gives the community much needed protein in the form of meat from trophies shot and paid for by the client.

Question 9C. Continued

Success of the hunting business that sound game management practices are followed at all times.

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.

NA → Taxidermist/Broker's signature: _____ Date: _____

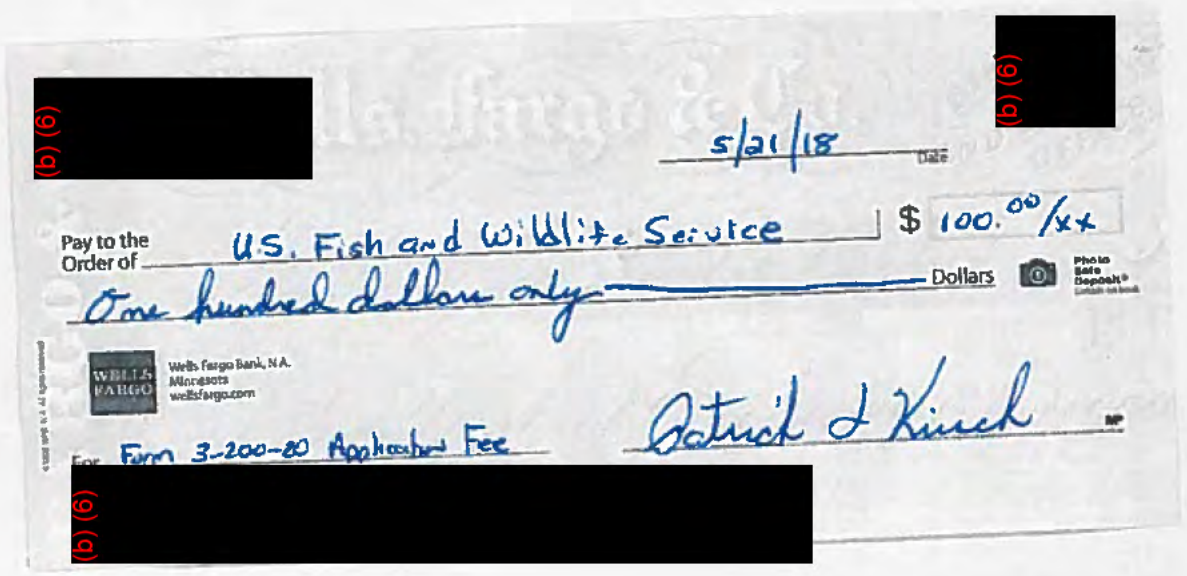
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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: Patrick J Kinsch Date: 5/21/2018

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).


(b) (6)
(b) (6)
5/21/18
Date
Pay to the Order of U.S. Fish and Wildlife Service
$ 100.00/xx
One hundred dollars only
Dollars
Photo Safe Deposit
WELLS FARGO
Wells Fargo Bank, N.A.
Minnesota
wellsfargo.com
For Form 3-200-80 Application Fee
Patrick J Kinch
(b) (6)

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import application / request for information

1 message

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:14 PM
To: patrick@summersetproducts.com

Mr. Kirsch,

We are in the process of reviewing applications for the import of African lions taken from Tanzania.

The U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. We are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings that were developed in the past. As such, we would like to give you the opportunity to submit additional information in support of your application. This may include (but is not limited to):

>>population status or trend data on the lion population, both the countrywide population and the local population;

>>information on the fees paid (e.g., licenses or trophy fees), recipients of these fees, and use of fees;

>>information about the safari outfitter, professional hunter, concession holder or land owner and their activities to conserve the species (e.g., habitat management or improvement, anti-poaching activities and success of those efforts, efforts to address human-lion conflict, population monitoring, community benefits). Copies of recent reports submitted to TAWA would be particularly helpful.

Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Butzler, Julia <julia_butzler@fws.gov>

Tanzania lion / import application / request for information

2 messages

Butzler, Julia <julia_butzler@fws.gov> Tue, Jul 24, 2018 at 4:14 PM
To: patrick@summersetproducts.com

Mr. Kirsch,

We are in the process of reviewing applications for the import of African lions taken from Tanzania.

The U.S. Fish and Wildlife Service must make a finding that the sport-hunting of lions will enhance the survival of the species. We are now considering applications on a case-by-case basis, as opposed to making country-wide enhancement findings that were developed in the past. As such, we would like to give you the opportunity to submit additional information in support of your application. This may include (but is not limited to):

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Do not hesitate to contact me with questions or clarifications.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

Patrick Kirsch <patrick@summersetproducts.com> Tue, Jul 31, 2018 at 11:30 AM
To: "Butzler, Julia" <julia_butzler@fws.gov>
Cc: Patrick Kirsch <patrick@summersetproducts.com>

Julia,

You can disregard and discard this application. There has been a change to my plans

And I am not hunting in Tanzania now.

Sincerely,

Patrick Kirsch

From: Butzler, Julia <julia_butzler@fws.gov>
Sent: Tuesday, July 24, 2018 3:14 PM
To: Patrick Kirsch <patrick@summersetproducts.com>
Subject: Tanzania lion / import application / request for information

[Quoted text hidden]

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 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: Grey H. Shores

Date: May 3, 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

RCVD JUN 14 2018 LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Shores	Gary	H	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Wichita Falls	Texas	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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

05/03/2018

Signature of applicant/Principal Officer 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: 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.

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

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo Melanochaita, 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, Dande North Hunting Area

   b. Date wildlife is to be hunted:

   09/13/2018 - 09/3/2018

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

   Charlton McCallum Safaris - Keith Wall, ph

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:

   b. Date wildlife was hunted:

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

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]:

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).

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:
Business Name: Please see attached -
Address:
City:
State/Province:
Country, Postal Code:

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?

Please see info previously provided by ZPWMA + Conservation Force

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?

Same

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

Same

Gary Shores

From: CMS <admin1@cmsafaris.com>
Sent: Friday, May 04, 2018 7:25 AM
To: (b) (6)
Cc: Keith Wall
Subject: Re: September Lion Hunt

Hi Gary,

Thank you for your emails. You may use the following for your permit

~~Name: Gary Shores~~
Company name: Opping Investments t/a Charlton McCallum Safaris
Address: 14 Yellow Wood Lane
Kambanji
Harare
Zimbabwe
Postal code: 0000

For # 8

Let me know if there will be anything else you may require, happy to help.

Have a lovely weekend
Kirsty

From: CM Safaris
Sent: Friday, May 4, 2018 10:12 AM
To: CMS
Subject: Fw: September Lion Hunt

From: Gary Shores (b) (6)
Sent: Thursday, May 3, 2018 4:33 PM
To: CM Safaris
Subject: September Lion Hunt

Dear Sir,
If we are successful in getting a lion during our September hunt with you at Dande I will need the name of the person o business shipping the trophy to me. The Federal Fish and Wildlife Permit Application asks for the following information:

Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

The trophy/trophies will be shipped to The Wildlife Gallery, Inc.

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: _____ Date: 05/03/2018

    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).

DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018

DAPU

DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate .... Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

We are now in the wet season, and rainfall has been scarce and late. Unfortunately that means unless we get good late rains, then 2018 could be a busy year for DAPU simply because local villagers could be very hungry indeed.

We have continued to meticulously document all of our support, deployments, wins and losses and here we share a summary with everyone who so graciously and generously supported all of our efforts both financially and in kind. As we grow from strength to strength we look forward to your continued support.

With Regards,

Myles E. McCallum
James D. Charlton
Charles Ndondo

Harare, Zimbabwe
10th January 2018

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Welcome

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Peter has undertaken (very graciously) to donate 40% of the proceeds of any of the works in the collection to DAPU. In addition to that, two outstanding oils of Peters were auctioned in 2017 generating over $4,000 for DAPU. So a HUGE thank you to Peter and our two highest bidders!

*** Auction # 1 ***

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visit us at www.dapuzim.com

4. The dry season.
Fires, Water, and Poaching

As I am sure most of you are aware, the 2017 rainy season was very kind indeed – in fact one of the best on record. So much so, that we had to get an extension to allow early burning a month late than normal. So luckily we had lots of water all year in Dande North. The East almost made it all year but not quite. DAPU patrols successfully patrolled the big water sources as often as possible to keep on top of the snaring.

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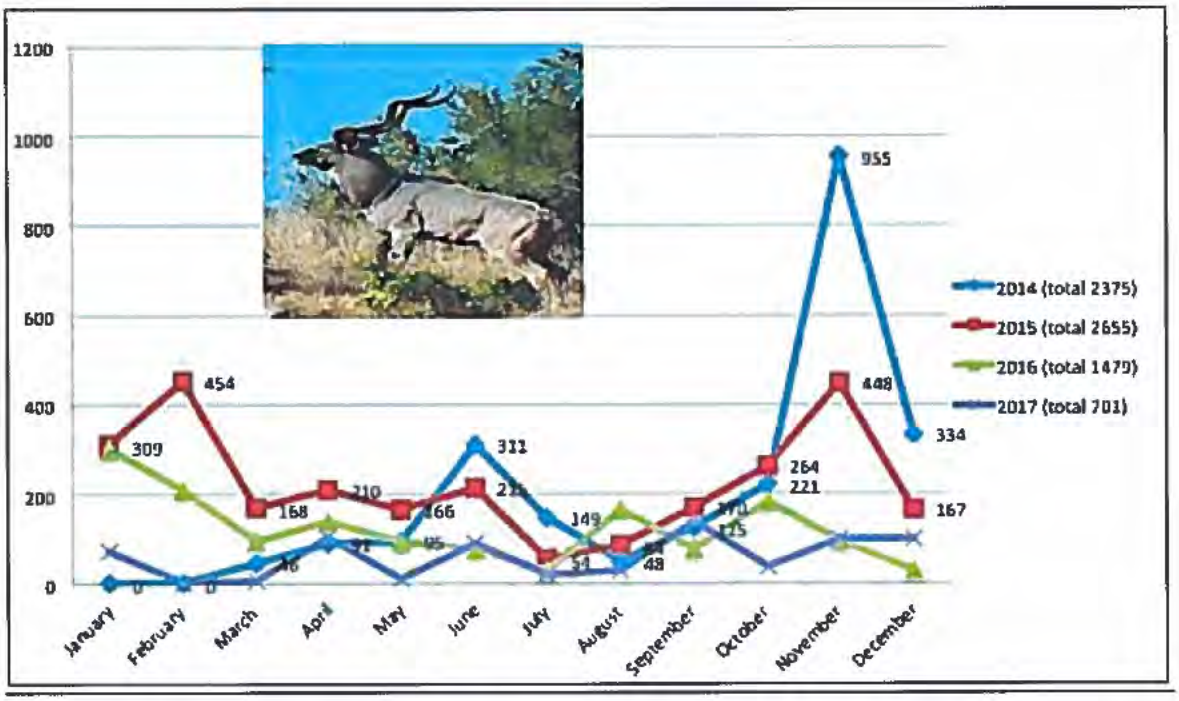
Full year snare yields compared



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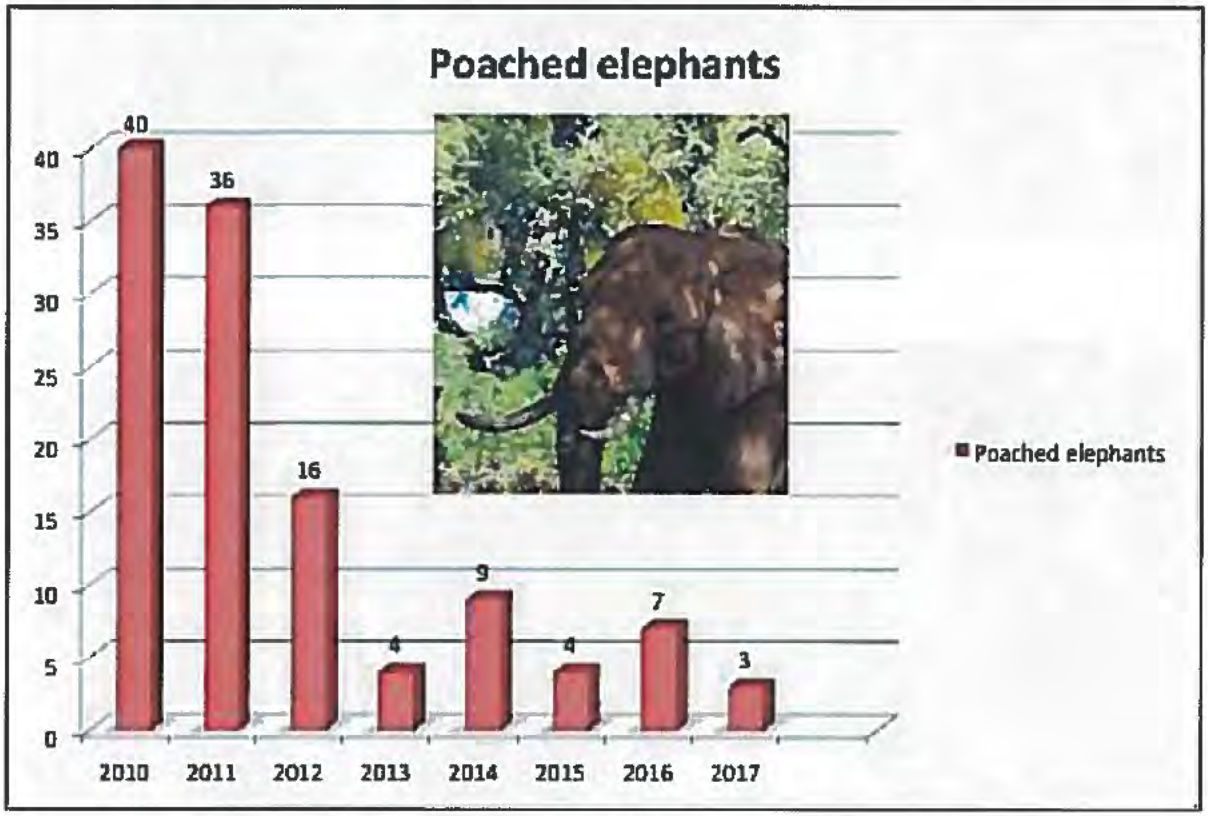

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Fish traps – Zambezi River 2017

(Funnily enough large gauge holes & eco friendly - just placed in wrong country!

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3	Repair firearms where possible or replace	Delivered!!!
4	New boots (on the way).	Stuck in Durban.
5	New uniforms – paid for not delivered.	Delivered.
6	If possible trade in one of the older DAPU vehicles for a newer one.	DSC-F has funded DAPU to the tune of 24,000 dollars towards a new pick up. Delivery expected end of January 2018.
7.	Install New solar pump in East by end of September	Done and pumping!

Aimguard shotguns x 6 per kind favor of a young Harare based hunter

*** 3200m of piping and solar pump installation Dande East, October 2018***

10. Conservation Force

We continue to work hand in hand with John and Chrissie Jackson of Conservation Force. John and Chrissie are proud hunters and legends in the fight for our way of life and the wild places that we all love.

Conservation Force is a registered non – profit
501(c)(3) public foundation.

How to make a Tax Deductible donation.

Please make a check out to:
Conservation Force

Mail to:
C/O John J. Jackson,III
3240 S. 1-10 SERVICE ROAD W.
SUITE 200, METAIRIE,
LOUISIANA 70001
USA

Check Ref: DAPU

Conservation Force Contact:
JOHN J. JACKSON,III
TEL:(504) 837 - 1233
FAX:(504) 837 – 1145
Email: Jjw-no@att.net
Website: www.conservationforce.org

11. Flying for wildlife and others.

We must extend our thanks to:

1. Flying for Wildlife for their aerial patrols that are conducted on request. These are volunteer pilots in their own machines and they help us at NO cost to DAPU, which is tremendous.

3. Pieter Gertenbach and Charl Grobelar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!

4. Trackit (Richard Tennant and Hannes Scholtz) who provide free, real time satellite monitoring of the two DAPU vehicles. This has really saved significantly on fuel and vehicle costs. Also of course we have been able to be much smarter with servicing, and positioning of vehicles.

12. DAPU Income and Expenses 2017

Income	
Bob Schofield	US$100
Burton Foundation	US$2,000
Communites Foundation of Oklahoma	US$2,000
David Adams	US$5,000
David Maple	US$500
DSCF.	US$24,000
Jeff Butterfield	US$250
Jeff Haulbrook	US$2,680
Jerry Beardmore	US$500
Jerry Jurena	US$600
Johnathan Frist	US$4,000
Jytte Merjtsensen	US$2,750
Martinus van der Linden	US$200
Mike Core	US$1,000
Morning Charitable Trust	US$500
Myron Repka	US$2,880
Sylvanus Charitable Trust	US$6,000
	US$54,960
2017 Hunting clients levies and contributions.	***US$13,116***
Charlton McCallum Safaris	***US$45,540***
Total Income	***US$113,616***

Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi, Muno Alfa & Owen.	Rations	Rewards	Fish poaching (ZAPP)	Total
January	US$1,100	US$1,605	US$770	US$784	US$250	US$4,509
February	US$1,100	US$1,605	US$770	US$150	US$250	US$3,875
March	US$1,100	US$1,605	US$770	US$19	US$250	US$3,744
April	US$1,100	US$1,605	US$770	US$133	US$250	US$3,858
May	US$1,100	US$1,605	US$910	US$9	US$250	US$3,874
June	US$1,100	US$1,605	US$910	US$118	US$250	US$3,983
July	US$1,100	US$1,605	US$910	US$439	US$250	US$4,304
August	US$1,100	US$1,605	US$910	US$48	US$250	US$3,913
September	US$1,100	US$1,605	US$910	US$1,327	US$250	US$5,192
October	US$1,100	US$1,605	US$910	US$68	US$250	US$3,933
November	US$1,100	US$1,605	US$910	US$1,574	US$250	US$5,439
December	US$1,100	US$1,605	US$910	US$34	US$250	US$3,899
Christmas	US$1,100	US$1,605	US$0	US$0	US$0	US$2,705
	US$14,300	***US$20,865***	***US$10,360***	***US$4,703***	***US$3,000***	***US$53,228***

# 2 2017 DAPU equipment expenses	
Grease Junkey repairs to AAX9832	US$5,000
Burj Auto spares for ABX 7074	US$1,267
MM Auto supplies spares and labour for ABX 7074	US$2,574
LG Harrisons Almguard shotguns x 6	US$3,450
Uniforms	US$2,684.00
Toyota Hilux	US$27,150.00
	US$42,125.00

# 3 Vehicles (2).	
AAX 9832 = 17050 km x $0.5 x km	US$8,525
ABX 7074 = 19476 km x $0.5 x km	US$9,738
Total	***US$18,263***

Total expenses		***US$113,616***
Total Income	***US$113,616***	
Shortfall / Credit		***US$0***

DAPU End of year Newsletter 2017

Charlton McCallum Safaris

10 January 2018

DAPU

DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate .... Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

We are now in the wet season, and rainfall has been scarce and late. Unfortunately that means unless we get good late rains, then 2018 could be a busy year for DAPU simply because local villagers could be very hungry indeed.

We have continued to meticulously document all of our support, deployments, wins and losses and here we share a summary with everyone who so graciously and generously supported all of our efforts both financially and in kind. As we grow from strength to strength we look forward to your continued support.

With Regards,

Myles E. McCallum
James D. Charlton
Charles Ndondo

Harare, Zimbabwe
10th January 2018

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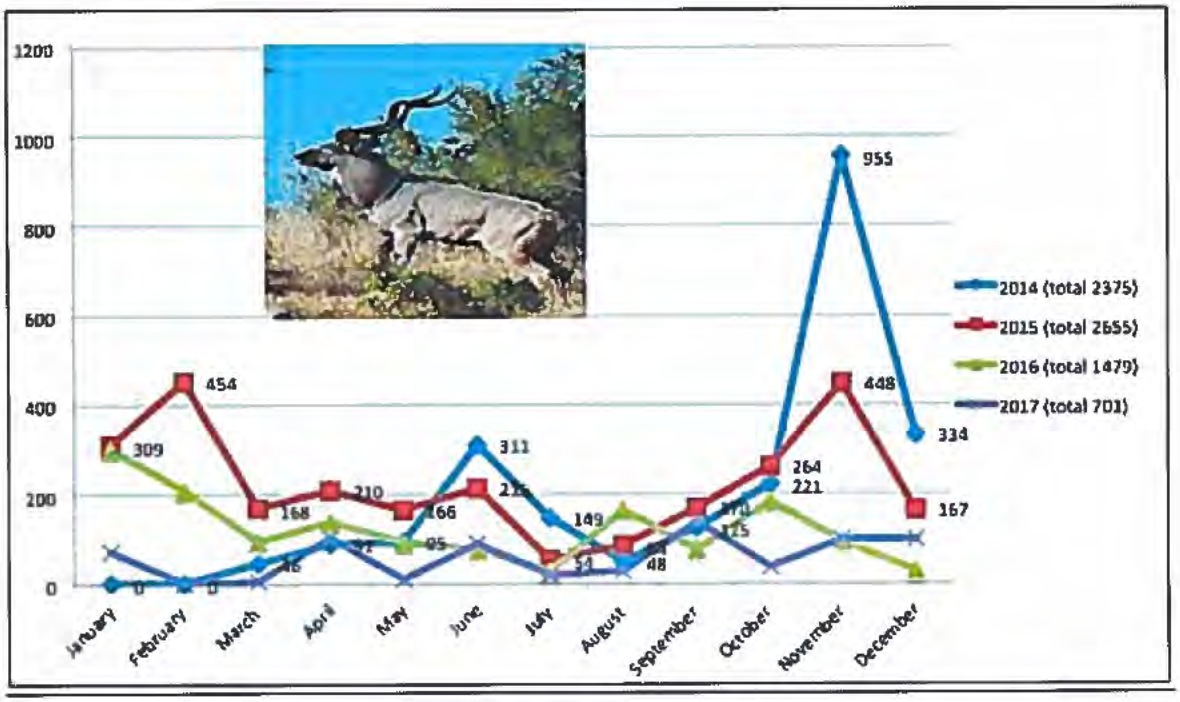

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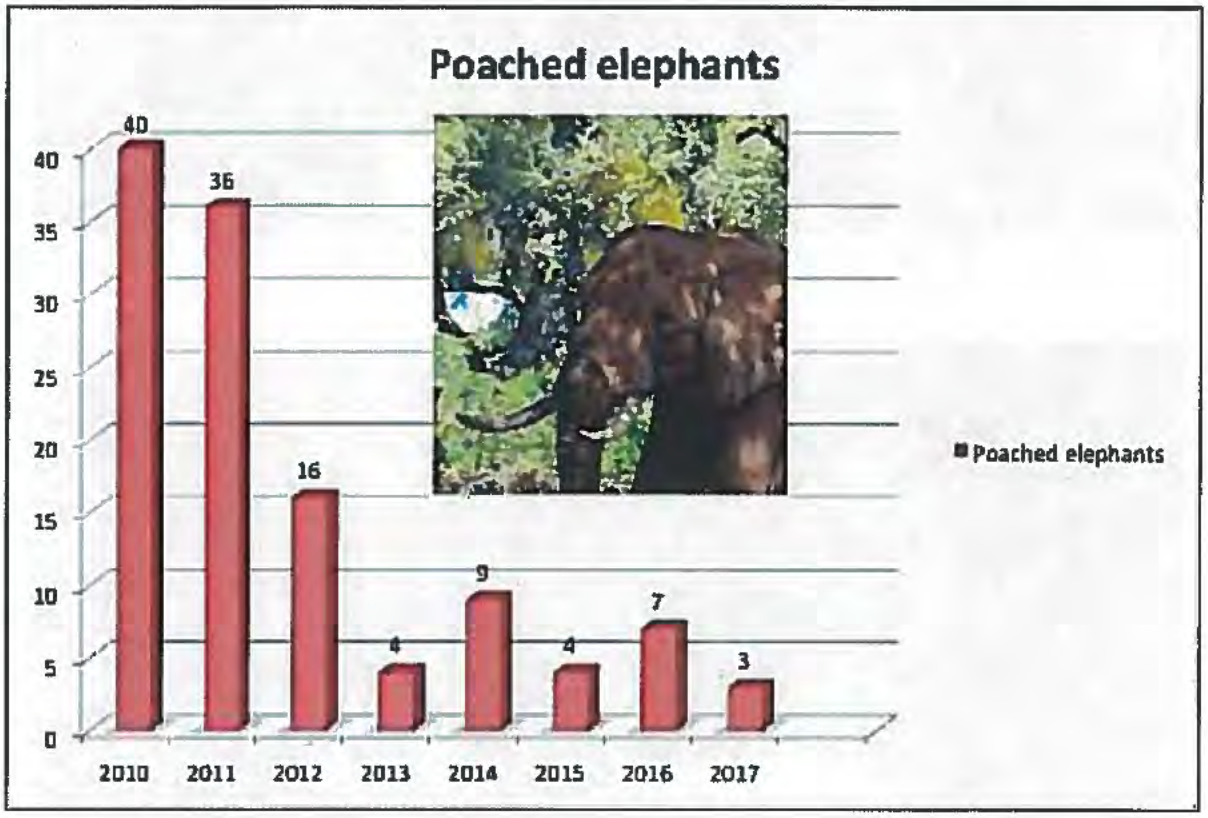

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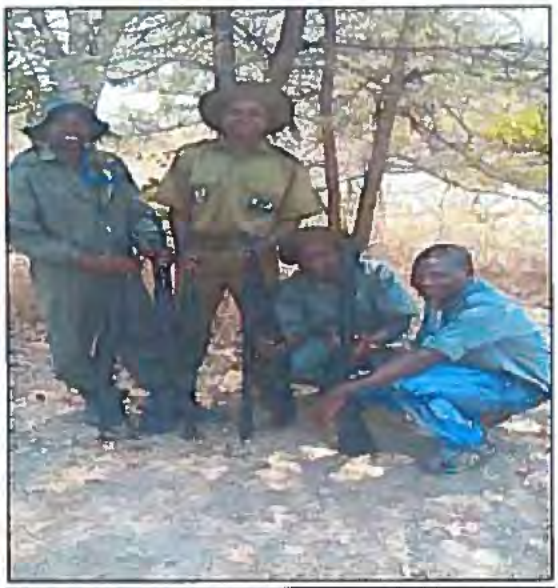

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LOUISIANA 70001
USA

Check Ref: DAPU

Conservation Force Contact:

JOHN J. JACKSON,III
TEL:(504) 837 - 1233
FAX:(504) 837 – 1145
Email: Jjw-no@att.net
Website: www.conservationforce.org

11. Flying for wildlife and others.

We must extend our thanks to:

1. Flying for Wildlife for their aerial patrols that are conducted on request. These are volunteer pilots in their own machines and they help us at NO cost to DAPU, which is tremendous.

3. Pieter Gertenbach and Charl Grobelar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!

4. Trackit (Richard Tennant and Hannes Scholtz) who provide free, real time satellite monitoring of the two DAPU vehicles. This has really saved significantly on fuel and vehicle costs. Also of course we have been able to be much smarter with servicing, and positioning of vehicles.

12. DAPU Income and Expenses 2017

Income	
Bob Schofield	US$100
Burton Foundation	US$2,000
Communites Foundation of Oklahoma	US$2,000
David Adams	US$5,000
David Maple	US$500
DSCF.	US$24,000
Jeff Butterfield	US$250
Jeff Haulbrook	US$2,680
Jerry Beardmore	US$500
Jerry Jurena	US$600
Johnathan Frist	US$4,000
Jytte Merjtsensen	US$2,750
Martinus van der Linden	US$200
Mike Core	US$1,000
Morning Charitable Trust	US$500
Myron Repka	US$2,880
Sylvanus Charitable Trust	US$6,000
	US$54,960
2017 Hunting clients levies and contributions.	***US$13,116***
Charlton McCallum Safaris	***US$45,540***
Total Income	***US$113,616***

Expenses

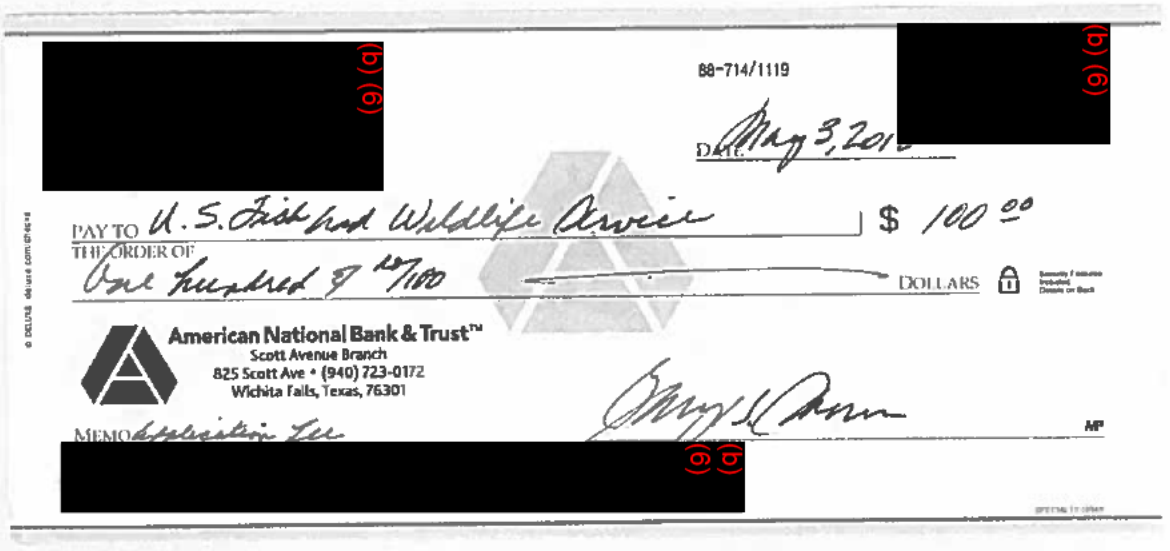
 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi, Muno Alfa & Owen.	Rations	Rewards	Fish poaching (ZAPP)	Total
January	US$1,100	US$1,605	US$770	US$784	US$250	US$4,509
February	US$1,100	US$1,605	US$770	US$150	US$250	US$3,875
March	US$1,100	US$1,605	US$770	US$19	US$250	US$3,744
April	US$1,100	US$1,605	US$770	US$133	US$250	US$3,858
May	US$1,100	US$1,605	US$910	US$9	US$250	US$3,874
June	US$1,100	US$1,605	US$910	US$118	US$250	US$3,983
July	US$1,100	US$1,605	US$910	US$439	US$250	US$4,304
August	US$1,100	US$1,605	US$910	US$48	US$250	US$3,913
September	US$1,100	US$1,605	US$910	US$1,327	US$250	US$5,192
October	US$1,100	US$1,605	US$910	US$68	US$250	US$3,933
November	US$1,100	US$1,605	US$910	US$1,574	US$250	US$5,439
December	US$1,100	US$1,605	US$910	US$34	US$250	US$3,899
Christmas	US$1,100	US$1,605	US$0	US$0	US$0	US$2,705
	US$14,300	***US$20,865***	***US$10,360***	***US$4,703***	***US$3,000***	***US$53,228***

# 2 2017 DAPU equipment expenses	
Grease Junkey repairs to AAX9832	US$5,000
Burj Auto spares for ABX 7074	US$1,267
MM Auto supplies spares and labour for ABX 7074	US$2,574
LG Harrisons Aimguard shotguns x 6	US$3,450
Uniforms	US$2,684.00
Toyota Hilux	US$27,150.00
	US$42,125.00

# 3 Vehicles (2).	
AAX 9832 = 17050 km x $0.5 x km	US$8,525
ABX 7074 = 19476 km x $0.5 x km	US$9,738
Total	***US$18,263***

Total expenses		***US$113,616***
Total Income	***US$113,616***	
Shortfall / Credit		***US$0***



[redacted] (b) (6)

88-714/1119

[redacted] (b) (6)

DATE May 3, 201[redacted]

PAY TO THE ORDER OF U.S. Fish and Wildlife Service $ 100 00

One hundred & 00/100 DOLLARS

American National Bank & Trust™
Scott Avenue Branch
825 Scott Ave • (940) 723-0172
Wichita Falls, Texas, 76301

MEMO Application Fee

[redacted] (b) (6)

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: L Kitt

Name: Lonnie Kitt

Date: 4/16/2018

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev 08/31/2020

RCVD JUN 14 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Kitt	Lonnie	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Schuyler	Nebraska	(b) (6)		U.S.A.

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. 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.

05/08/2018

Signature of applicant/Principal Officer 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: 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:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) 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

(4) 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.

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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 regular mail through the U.S. Postal Service.

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

   Conservation Force - Phone: (504) 837-1233 Email:cf@conservationforce.org

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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera, Panthera leo, 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:

   Zambia, Luangwa Valley, Nyaminga GMA near Mfuwe Town

   b. Date wildlife is to be hunted: 06/01/2018- 06/21/2018

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

   Paya Kakuli Safaris - Leon Kachelhoffer, Professional Hunter

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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). HAVE NOT HUNTED YET. DO NOT hold PERMITS YET.

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: MIKE BORNMAN
Business Name: BANGWEULU TAXIDERMY, LTD.
Address: 4142/K CHIFWEMA ROAD
City: NEW KASAMA, LUSAKA
State/Province:
Country, Postal Code: ZAMBIA 10101

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 05/08/2018

    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.

All international shipment(s) must be imported 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).

P.O.Box 32502 Lusaka 10101 Zambia Phone 0026 0955 453630/0026 0977 776010
Email: brodahood6010@hotmail.com or trophytrackersconsult@gmail.com

ENHANCEMENT REPORT

Company & Concession Description

Paya Kakuli Safaris Ltd has been operating in Nyaminga Game Management Area since 2014 .The concession is 840 square kilometers and provides habitat for a range of species including Baboon Buffalo Bushbuck Bushpig Crocodile Duiker Eland Grysbok Hippo Hartebeest Hyaena Impala Kudu Leopard Lion Oribi Puku Roan Antelope Warthog Waterbuck Cooksons Wildebeest Zebra. We have a lease with the Dept of National Parks & Wildlife Services of Zambia for seven years, renewable.

The Directors are Zambian born and our Company is family owned and has been operating for seven years.We employ a Resident Professional Hunter and two other Professional Hunters & Camp Staff of 24 including Game Trackers ,Skinners, Chefs Waiters & Cleaners.
Our operations support in excess of 200 dependents in the local villages. Our Lease is a comprehensive concession plan which includes anti poaching and community support.

Anti Poaching Component

Paya Kakuli Safaris employs 28 Village Scouts for Anti Poaching and spends $10,000 annually on Law Enforcement, of which $2500 is spent quarterly.Our teams work closely with the National Parks & Wildlife Services conducting comprehensive anti poaching patrols.
We also supply both food rations and fuel for the patrols and provide uniforms boots & caps.
The company has also donated Shotguns ammunition and HF Radios to assist in the anti poaching.Paya kakuli safaris supplied and erected a Transmitter/Repeater Antenna with Radios for communication ease, being vital for our Anti Poaching Patrols, which has led to numerous arrests and confiscations of snares meat and weapons.
Paya Kakuli Safaris has also undertaken the rehabilitation of the Scout Camps. Our Area is heavily patrolled and sweeps are carried out by vehicle and on foot. We also undertake all maintenance of the vehicle for Dept of National Parks & Wildlife. We have erected an an office for the Community Resources Board for Meetings and additionally donated donated bicycles to help them in their endeavours for patrolling and to sensitize and

educate the community. Our contract is such that the monies generated from the Safari Hunting is split 60/40 with dept of national Par4ks and the Local Community. In the years 2016/2017 we generated $320,000 in Area Fees & Trophy Fees.

Community Participation

Paya Kakuli Safaris are committed to support the local community and to this end 50% of the meat derived from our safaris is donated and delivered to them. In addition we have put in 4 Boreholes and Medical Clinic, House for Teaching Staff and a Dormitory for Girls and the School.We have also donated a Motor Vehicle for Community Based Projects and Anti Poaching.

Habitat Protection & Conservation Development

Our anti poaching efforts have allowed the Game Population to improve over the three years we have had the concession. We have deepened 7 of the animal watering holes and have filled these with water from the newly dug boreholes when there is a shortage of water.
In our efforts to survey Lion in our Area we record sightings,spoor and as much data as is known on any individual. Because we are keeping these records we ensure that our limited offtake is sustainable. We also follow the age based policy of not harvesting Lions below the age of 6 years.

The Majority of our Lion and Elephant Hunters are from the United States and these hunters follow conservation ethics that see them contributing above their fees to the community and towards anti poaching in the Hunting Area.
The revenue from Lion and Elephant Hunting are our highest value hunts and generate approximately 50% of our overall revenue and Lion alone approx 35%.

In summation, Paya Kakuli Safaris sustainable hunting program not only enhances the sustainability of the survival of the Lion and all Wildlife in our Area but it also serves to protect the habitat. Revenue generated by the Safari Company demonstrates the value of the Wildlife to the local community and provides an incentive to ensure this natural resource is around for generations to come.

ATTACHMENTS

Map of Game Management Area

Supportive Letters/acknowledgements from village/district leadersChief Kazembe

Anti poaching reports

Letters of Donation Receipt for :

Motor Vehicle
Shotguns & Ammunition
HF Radios
Community Based Projects for Local Community.

Photographs of :

Poachers and Illegal Timber Cutters Apprehended

Transmitter/Repeater Installations

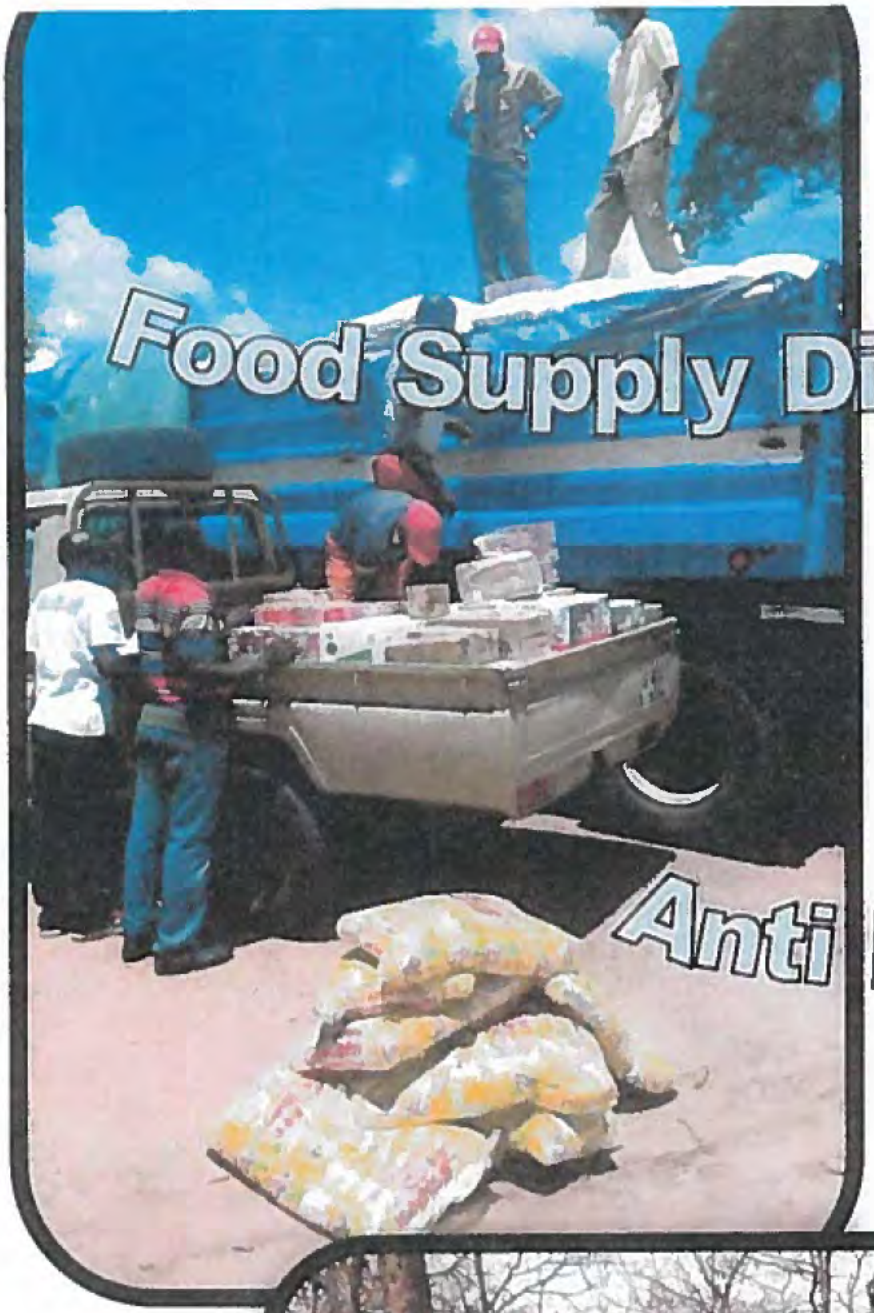
Meat Districbution to Villagers

Supply Rations to Scouts/Anti Poaching Patrols

Meat Distribution to Villagers

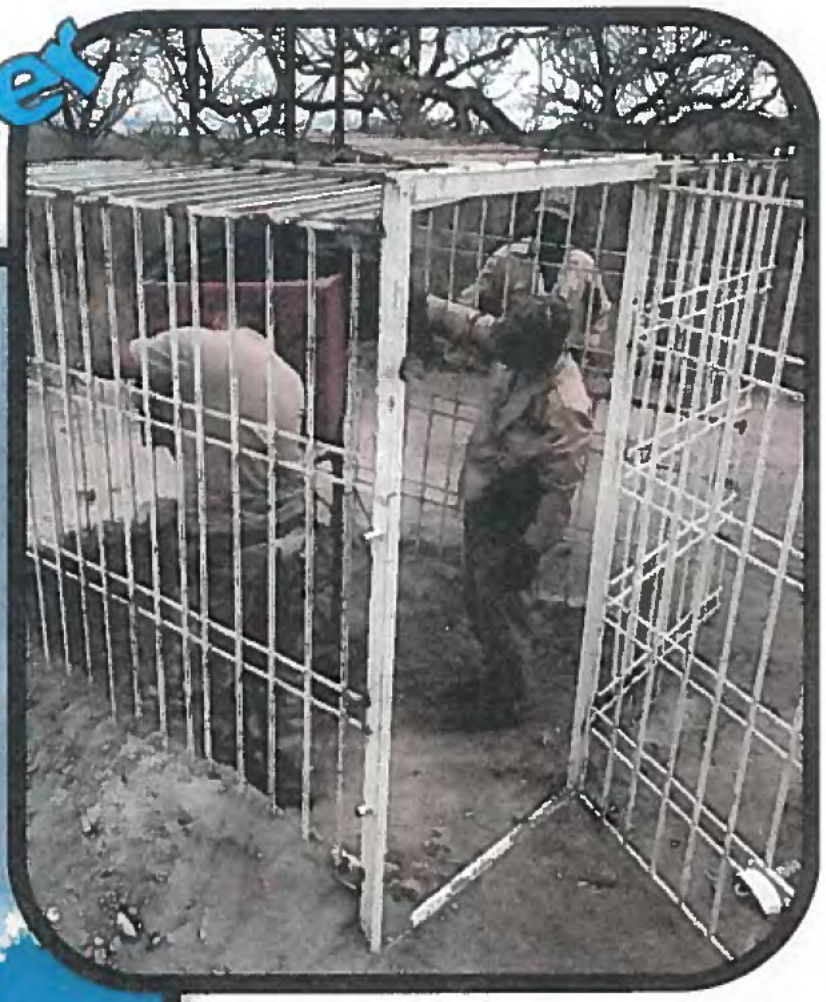
Poachers Caught

Illegal Timber Apprehended



Anti Poaching

Radio Transmitter & Repeater



Communication Network for Anti Poaching Patrols

MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag 1, Kafue Road, Chilanga, Zambia
Telephone: +260-211-279080 / 278366 / 278555 / 278365
Telefax: +260-211-278524 / 278244 / 278471
Email: info@zawa.org.zm

All correspondence should be addressed to the Director

12th April, 2017

The Director
Paya Kakuli Safaris
LUSAKA

REF: HANDING OVER OF COMMUNITY VEHICLE REGISTRATION NUMBER ABD 561

The captioned subject matter refers.

We are delighted to inform you that after a comprehensive assessment of the Land Cruiser hard top bearing registration number ABD 561 by our Workshop Foreman in presence of His Royal Highness Chief Kazembe, the Wildlife Ranger based in Lundazi and CRB Chairperson, we are hereby beseeching the release of the captioned vehicle to Kazembe Community Resources Board as per agreement embedded in the documented minutes dated 13th February, 2017.

Further, we are also pleased to learn that your company will be rendering free intensive vehicle service once a year for the entire period of the Hunting Concession Agreement amidst the routine auto service requirements that will be financed by the CRB. This gesture will enhance supplementary efforts in maintaining road worthiness of the vehicle while prolonging its life span.

In view of the foregoing, it is a firm anticipation of the Department that all parties involved will abide by the terms of reference vividly stipulated in both the consent letter and minutes. By and large, the Department is therefore not sceptical that the aforementioned vehicle will assist in enhancing the tenets of Community Based Natural Resources Management and resource protection in Lumimba GMA.

Yours faithfully

Paul Zyambo
DIRECTOR

Southern Region Office
P.O. Box 60086
Livingstone
Tel: +260-213-321396

Eastern Region Office
P.O. Box 18
Mfuwe
Tel: 062 45021 / 062 45042

Northern Region Office
P.O. Box 710393
Mansa
Tel: +260-212-8221735

Western Region Office
P.O. Box 830124
Mumbwa
Tel: 01 800056

MINISTRY OF TOURISM & ARTS

Department of National Parks and Wildlife

Private Bag 1, Kafue Road, Chilanga, Zambia
Telephone: +260 211-278000, 278800, 278855, 278400
Telefax: +260 211-278824, 278824, 278471
Email: info@zawa.org.zm

All correspondence should be addressed to the Director

7th June, 2017

The Director
Pava Kakuli Safaris Limited
P.O. Box 32502
Bwinjimfumu Road
LUSAKA

Dear Sir,

REF: DONATION OF TWO HIGH FREQUENCY (HF) RADIOS

Reference is hereby made to your letter dated 17th May, 2017, in which you pledged to donate two (2) High Frequency Radios under Law Enforcement Pledge for the fiscal year 2017 to Zokwe Camp for communication purposes.

The Department wishes to thank you for this timely gesture that will significantly contribute to the emergency and security communication needs of Zokwe Camp and its surrounding areas. Most importantly, this trend is firmly anticipated to enhance resource protection in the respectively Game Management Area.

Lastly, the Department would like to express its sincere gratitude for the conservation partnership your company has continued exhibiting, especially in the areas of resource protection and socio-economic development.

Yours faithfully,

Austin Mwakifwamba
ACTING DIRECTOR – DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
***for*/PERMANENT SECRETARY – MINISTRY OF TOURISM AND ARTS**

Tel: +260 211 223930
Fax: +260 211 223930
Telex: ZA 45510
Email: psmta@mta.gov.zm

REPUBLIC OF ZAMBIA

In reply please quote

No.....

MINISTRY OF TOURISM AND ARTS

OFFICE OF THE PERMANENT SECRETARY

KWACHA HOUSE
CAIRO ROAD
P.O. Box 30575
10101 LUSAKA

MTA/NPW/4/9/1sec

18th December, 2017

The Director
Paya Kakuli Safaris Limited
Plot No. 284 Bwinji Mfumu Road
P.O. Box 32502
LUSAKA

RE: DONATION OF SIX SHOT GUNS TO THE DEPARTMENT OF NATIONAL PARKS AND WILDLIFE FOR OPERATIONS IN NYAMINGA HUNTING BLOCK

The above captioned subject matter refers.

The Ministry of Tourism and Arts wishes to acknowledge receipt of your letter dated 11th December, 2017 in which you donated Six (6) Shot guns to the Department of National Parks and Wildlife for operations in Nyaminga Hunting Block (your concession area) for the year 2018.

The Ministry is grateful of your donation and wishes other safari hunting outfitters would emulate your gesture. We would like to assure you that the fire arms will be put to good use.

Looking forward to continue working with you.

pp

Liya Nawa Mutale (Dr.)
Permanent Secretary
MINISTRY OF TOURISM AND ARTS

Paya Kakuli Safaris Limited

Address : Plot 284 Bwinjimfumu Road , P O Box 32502,Lusaka
Email : brodahood6010@hotmail.com
Tel : +260-977-776010

THE DIRECTOR GENERAL

National Parks and Wildlife

Headquarters, Chilanga

Lusaka Province

Zambia.

06/10/2016.

DEAR SIR,

RE: **DONATION OF 6 SHOTGUNS & 50 AMMUNITIONS**

Kindly receive a donation of 6 shot guns and 50 ammunitions as promised by Paya-kakuli safaris for Nyaminga hunting Block.

YOURS FAITHFULLY,

Faizel Lulat – DIRECTOR

Received by :

Shimfwe Mwanza

Kamwala Community Resource Board

On 25 April 2016 the board had a meeting at Mb[illegible] wildlife camp to budget on the K87 500.00 allocation for 2015 pledge money. The board resolved and agreed to [illegible].

1. 1 Teacher's house at Mkimbiza [illegible] (1) amounting K7 880
2. Chibombe Community School amounting K5120.00
3. Zerwe - 1 Teacher's house amounting K7150.00
4. Completion of [illegible] dormitory at [illegible] Day Sec School 2100 for 50 pkts of cement.

Three quotations were collected from three different suppliers namely.

1. Christopher Zimba Hardware - K12825
2. Mbee Trading - K13555
3. Gomeka Enterprise K13655

The board had choosen Christopher Zimba who had the lowest prices.

Mwila Kaunda [illegible]

KAZEMBE COMMUNITY RESOURCE BOARD (CRB)
P.O Box 530007
Lundazi

24.03.2018

TO WHOMEVER MAY CONCERN

KAZEMBE COMMUNITY RESOURCE BOARD 2017
RECOMMENDATION REPORT

We the people living within the confines of Kazembe Chiefdom, in order to manage effectively commercial business of Wildlife and other resources, established a Community Resource Board to the powers entrusted in us, under the Zambia Wildlife Act Number 12 of 1998.

An agreement was made and entered on 16th day of March 2015 between the Zambia Wildlife Authority by then but now Department of National Parks and Wildlife (DNPW), the outfitter Paya Sakuli and the Kazembe Community, under the Zambia Wildlife Act Number 12 of 1998.

The Parties agree and acknowledged that the agreement shall be governed by and construed in accordance with the Laws of the Republic of Zambia.

Objectives

- To protect Wildlife and other Natural resources and to prevent all forms of illegal use of natural resources.
- To provide an environment conducive to a positive relationship with Safari Hunting companies (and their Clients)
- To increase the population of wildlife in the area.

Benefits from:

- Concession

In 2017, 107,000 USD was received from animals fees and was divided into three categories such as 20% which went to CRB Administration from it 1x6 CRB Office Block was erected at Kazembe Headquarters, 14 Bicycles for CRB members were bought to patrol and sensitize community members on conservation and other office equipment were procured, 35% it was spent on Community development e.g Infrastructure developments such as Clearing of hunting Roads, 1x10 compartments Girls dormitory was constructed at Kazembe Secondary

School. 3 Teachers houses were Constructed and 1 house at Zokwe for a Nurse was constructed.

45% was spent on 28 Village Scouts salaries who are CRB employees. Field Patrol Rations was bought for 4 Camps used to combust poaching in the area. Patrol gear such as Camping Tents and Uniforms were bought. The Company supported four (4) CRB quarterly meetings on planning and budgeting.

50% of all edible meat was distributed to all VAGs and to DNPW according to the concession agreement.

57000 USD was paid by Safari Company to the Government as a concession fee where 50% goes to the Government and 50% is plowed back to the community.

100000 USDwas spent on Law Enforcement independently of which covers quota of the year 2,500 USDis spent on field Patrol food packs, for four (4) wildlife camps within the Hunting block.

2120 USDis spent by the company on yearly evaluation meeting by Department ofNational Parks and Wildlife and other stake holders to know the performance of the Company to which 2017 performanceof Companywas tremendously good.

- OBligation

Six (6) Firearms and 50 x 12 bore ammunitions were provided to combust poaching in the Game Management Area within the hunting block.

- Pledge

One Motor Vehicle for the Community was purchased (Land Cruiser) and annually servicing is done by the Safari operator.Maintenance of DNPW Motor Vehicle is as well done by the operator. Four (4) Bore holes in the Community were drilled. Two (2) HF Radios for communication in the area wereprovided by the Safari Companyand (1) Tower was erected for signal.

Financial support and logistics for on the spot anti-poaching activities is provided such as fuel deploying officers in the field, transport costs by taking suspects to and from Court, informer incentives and some other Courtlogistics.

REPUBLIC OF ZAMBIA
CHIEF KAZEMBE
NYIMBWE HEADQUARTERS
24 MAR 2018
CHIEF'S OWN PALACE
P/A KAULASISI
LUNDAZI

His Royal Highness Chief Kazembe
Chief's own Palace
Nyimbwe Palace
P/A Kaulasis
Lundazi
18th February 2016,

THE DIRECTOR GENERAL,
NATIONAL PARKS AND WILDLIFE (ZAWA),
PRIVATE CHIANGA,
LUSAKA.

Dear Sir,

SAFARI OPERATOR'S COMMITMENT TO KAZEMBE COMMUNITY

Kindly refer to the above captioned subject matter. So far, I have had no problems, dealing with the safari operator, director for safari hunting company **paya – kakuli**. Mr **Faizel Lulat** has had a very good working relationship with me the patron for Kazembe Community Resource Board (CRB) in Nyaminga Hunting Block and the community at large. He has always wanted to consult (ZAWA) and me the now **National Parks and Wildlife** when it comes to the issues to do with Kazembe Community Development, he wants transparency in his dealings. The Community Resource Board for Nyaminga Hunting Block, National Parks and Wildlife should work together in consultation so that there is proper transparency in all transactions. He will always want the consent and the knowledge of the Patron and National Parks and wildlife (ZAWA) before he does anything, as he already made funds available for his obligations to the community to avoid any confusions.

Your assistance and understanding on this matter will highly be appreciated.

Yours Faithfully,

The Patron,

Kazembe Community Resource Board.

Chief Kazembe

BANDA VINCENT

REPUBLIC OF ZAMBIA
CHIEF KAZEMBE
NYIMBWE HEADQUARTERS
18 FEB 2016
CHIEF'S OWN PALACE
P/A KAULASISI
LUNDAZI

Cc. Area Warden - Chipata

Cc. Director – Finance

Cc. The Officer – CBNRM

Cc. Park Ranger - Lundazi

I Tennyson Mumuni a Senior Legal Officer under Department of National Parks and Wildlife acknowledge receipt of K21,200 for Evaluation Exercise of the Hunting Concession Agreement for Paya Katuli

AG/SLO
01/11/17

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   b. Sex (if known).

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:
   ZAMBIA
   LUANGWA VALLEY. NYAMINGA GMA NEAR MFUWE TOWN

   b. Date wildlife is to be hunted: JUNE 1ST TO 21ST, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   PAYA KAKULI SAFARIS. PROFESSIONAL HUNTER LEON KACHELHOFFER

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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).

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].

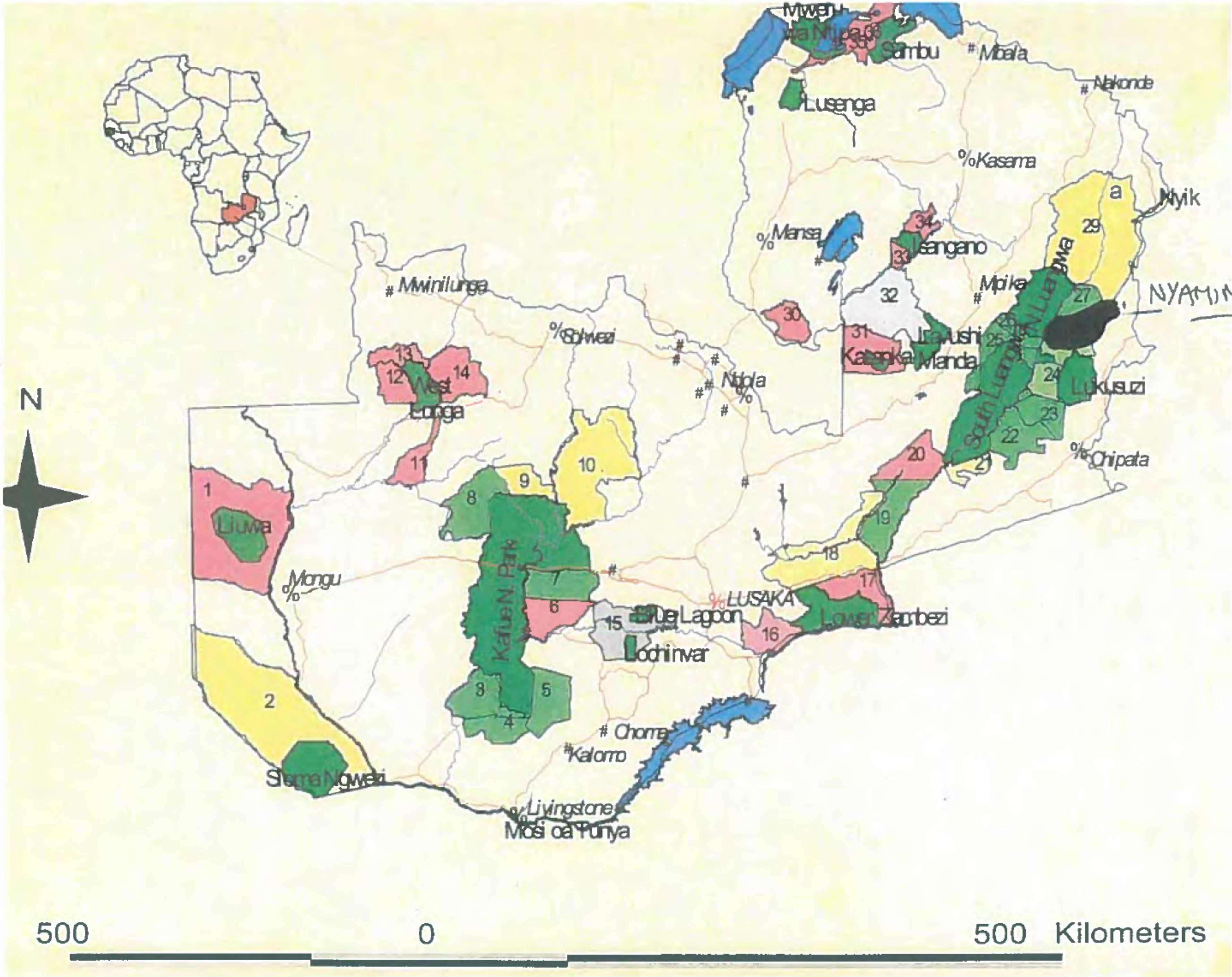
Name: MR. MIKE BORNMAN
Business Name: BANGWEULU TAXIDERMY LTD.
Address: 4142/K CHIFWEMA ROAD
City: NEW KASAMA, LUSAKA
State/Province:
Country, Postal Code: ZAMBIA 10101

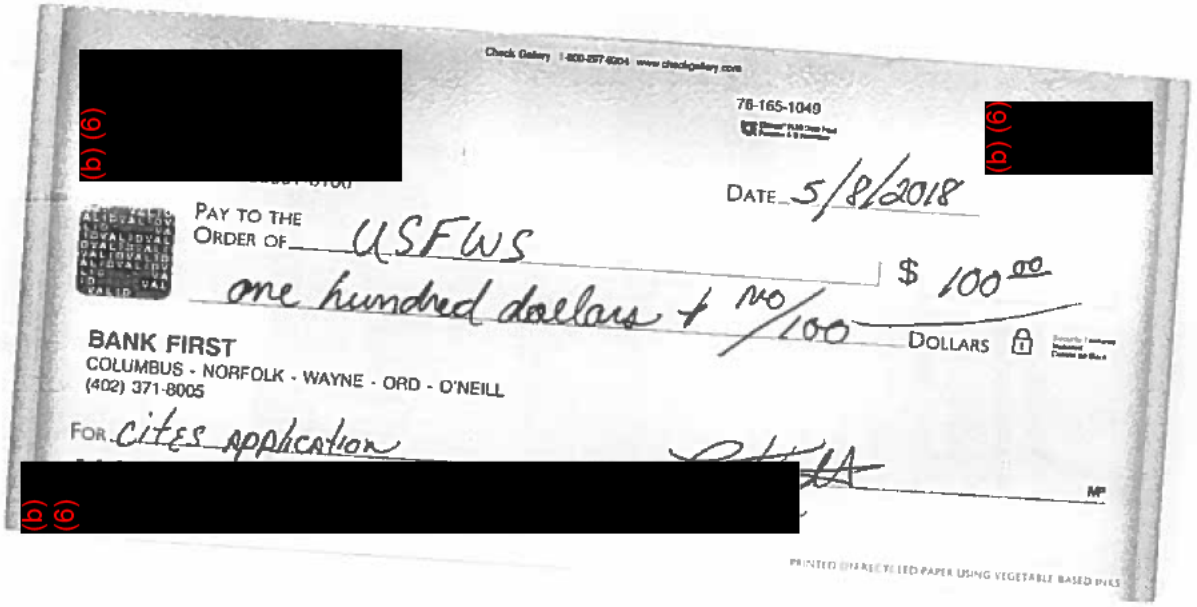
9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or 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?

   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?

   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?


N
Mweru wa Ntipa
Sumbu
Mbala
Nakonde
Lusenga
Kasama
Nyik
Mansa
Isangano
Mpika
NYAMINGA
Mwinilunga
Solwezi
Lavushi Manda
Kasanka
Ndola
West Lunga
Lukusuzi
South Luangwa
N. Luangwa
Chipata
Liuwa
Mongu
Kafue N. Park
LUSAKA
Blue Lagoon
Lochinvar
Lower Zambezi
Choma
Kalomo
Sioma Ngwezi
Livingstone
Mosi oa Tunya
500
0
500 Kilometers


(b) (6)
78-165-1049
(b) (6)
DATE 5/8/2018
PAY TO THE ORDER OF USFWS
$ 100 00
one hundred dollars + NO/100 DOLLARS
BANK FIRST
COLUMBUS - NORFOLK - WAYNE - ORD - O'NEILL
(402) 371-8005
FOR cites application
(b) (6)

RCVD JUN 27 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Allen	Chad		
(b) (6) [redacted]	3.a. Alternate Telephone Number	4. E-mail address	
	847-690-0690	lisa@dlclub.com	

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 #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cleburne	TX	(b) (6) [redacted]		U.S.A
2.a. Mailing address (include if different than physical address; include name of co				
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100. 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)

Lisa Jamnik 6/18/2013

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.

DHL GMB, LLC
1500 Midway Ct., Ste W201
Elk Grove Village, IL 60007

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

Lisa Jamnik 847-690-0690
lisaj@dlchb.com

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.

4. 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

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:

   n/A

   b. Date wildlife is to be hunted:

   n/A

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

   n/A

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:

   Umfurudzi Game Park, Masanaland West, GIS 686001 Harare

   b. Date wildlife was hunted:

   11/11/2017

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

Umfurudzi Park
Richard Tabor

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]:

Colletts Wildlife Artistery
15 Josiah Chinamano Rd
Belmont, Bulawayo Zimbabwe

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).

See attached

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:
Business Name: Colletts Wildlife Artistery
Address: 15 Josiah Chinamano
City: Belmont, Bulawayo
State/Province:
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?

not available

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?

not available

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

not available

OMB Control No. 1018-0093
Expires 08/31/2020

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: 6/18/2018

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: _____ Date: _____

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).

Chicago

#9494

CUSTOMS POWER OF ATTORNEY
and
Acknowledgement of Terms and Conditions of Service

Copyright 1936, National Customs Brokers and Forwarders Association of America, Inc.
(Revised 07/04)

✓ appropriate box:
- [x] Individual
- [ ] Partnership
- [ ] Corporation
- [ ] Sole Proprietorship
- [ ] Limited Liability Company

SS#✓ (b) (6) [redacted]

KNOW ALL MEN BY THESE PRESENTS: That, ✓ CHAD E. ALLEN (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identify) doing business as a ✓ INDIVIDUAL (individual, partnership, corporation, sole proprietorship, or limited liability company) under the laws of the State of ✓ TEXAS, residing or having a principal place of business at ✓ (b) (6) [redacted] CLEBURNE, TX. hereby constitutes and appoints ✓ D&L CHB, LLC (Grantee's Name), its officers, employees, and/or specifically authorized agents, to act for and on its behalf as a true and lawful agent and attorney of the grantor for and in the name, place and stead of said grantor, from this date, in the United States (the "territory") either in writing, electronically, or by other authorized means, to:

Make, endorse, sign, declare, or swear to any customs entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or regulation in connection with the importation, exportation, transportation, of any merchandise in or through the customs territory, shipped or consigned by or to said grantor;

Perform any act or condition which may be required by law or regulation in connection with such merchandise deliverable to said grantor; to receive any merchandise;

Make endorsements on bills of lading conferring authority to transfer title; make entry or collect drawback; and to make, sign, declare, or swear to any statement or certificate required by law or regulation for drawback purposes, regardless of whether such document is intended for filing with U.S. Customs and Border Protection;

Sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits or statements in connection with the entry of merchandise;

Sign and swear to any document and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated by said grantor;

Authorize other Customs Brokers duly licensed within the territory to act as grantor's agent; to receive, endorse and collect checks issued for CBP duty refunds in grantor's name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor;

And generally to transact Customs business, including filing of claims or protests under section 514 of the Tariff Act of 1930, or pursuant to other laws of the territories, in which said grantor is or may be concerned or interested and which may properly be transacted or performed by an agent and attorney;

Giving to said agent and attorney full power and authority to do anything whatever requisite necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents;

This power of attorney to remain full force and effect until revocation in writing is duly given to and received by grantee (if the donor of this power of attorney is a partnership, the said power shall in no case have any force or effect in the United States after the expiration 2 years from the dates of its execution);

Grantor acknowledges receipt of ✓ D&L CHB, LLC (Grantee's Name) Terms and Conditions of Service governing all transactions between the Parties.

If the Grantor is a Limited Liability Company, the signatory certifies that he/she has full authority to execute this power on behalf of the Grantor.

IN WITNESS WHEREOF, the said ✓ CHAD E. ALLEN (Full name of company)
caused these presents to be sealed and signed: (Signature) ✓ [signature]
(Capacity) ✓ N/A Date: ✓ 10-10-2017
Witness: (if required) N/A

If you are the importer of record, payment to the broker will not relieve you of liability for CBP charges (duties, taxes or other debts owed CBP) in the event the charges are not paid by the broker. Therefore, if you pay by check, CBP charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to CBP by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

APPERSON PRINT MANAGEMENT SERVICES • NCBFAA-3 • WHSE. NO. 00540

We the People
Of the United States,
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
3
PASSPORT
PASSEPORT
PASAPORTE
USA
UNITED STATES OF AMERICA
P
USA
(b) (6)
ALLEN
CHAD EDWARD
UNITED STATES OF AMERICA
(b) (6)
KANSAS, U.S.A.
M
29 Jan 2016
United States
Department of State
28 Jan 2026
SEE PAGE 51
USA
P<USAALLEN<<CHAD<EDWARD<<<<<<<<<<<<<<<<<<<<<<
(b) (6)

CHAD ALLEN - LION

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000079977
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tradelk Trading (Pvt) Ltd	**Client's Full Name**	Chad Allen
ZTA (HOP) No.	HOP0304	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	**Address**	(b) (6)
Name of Professional Hunter	G WHITTAL	**Licence No.**	421
Telephone		**Fax**	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	COLLETTS WILDLIFE ARTISTRY	**Address**	15 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Shipping Agent	MAPLE SHIPPING AND FREIGHT	**Address**	4 BELMONT ROAD, BULAWAYO
Name of Foreign Agent		**Address**	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Bedford	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	11-12-2017
Date of Safari To	20-12-2017
Daily Rate Charged For Big Game USD	400.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(I) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	27-FEB-2018	DMS/4625	14-MAR-2018	USD	28,161	28,161
2						
3						
4						

(II) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	4,466.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	23,300.00
Other fees (Incidentals)	395.00	Grand Total USD	28,161.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Humani	vn137425	15-DEC-2017	24 5/7	21,000
2	GIRAFFE	M	Killed	Humani	VN162309	14-DEC-2017		1,500
3	HYENA	M	Killed	Humani	vn067227	16-DEC-2017	19	800
4								
5								
6								
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29								
30								

SECTION A: LEOPARD HUNT RETURN FORM

1. TR2 SERIAL NUMBER: 00000 79977
2. HUNTING OUTFITTER: TEGEEK TRADING (PVT) LTD.
3. PROFESSIONAL HUNTER: GUY WHITTALL
4. PROPERTY/CONCESSION/CAMPFIRE AREA NAME: HUMANI
5. MINIMUM NUMBER OF DAYS BOOKED FOR LEOPARD HUNT: 14
6. i) BAIT & BLIND: ☑ ii) ON FOOT: ☐ iii) HOUNDS: ☐
7. i) RIFLE: ☐ ii) SHOTGUN: ☐ iii) HANDGUN: ☐ iv) BOW: ☐
8. i) SUCCESSFUL HUNT: ☐ ii) FAILED HUNT: ☑

Only complete questions 9-10 if a hunt was unsuccessful
9. WAS A LEOPARD WOUNDED DURING A FAILED HUNT: Y N
10. IF HUNT FAILED, WHAT WAS THE REASON?

Complete 11-14 for both successful and unsuccessful hunts
11. TOTAL NUMBER OF BAIT NIGHTS

12. NUMBER OF LEOPARDS RECORDED ON BAITS

Sex/Age	Number	Evidence (sighting, tracks, trail camera)
Adult male		
Adult female		
Subadult male		
Subadult female		
Unknown		

13. DATE OF HUNT START

Complete questions 14-17 if a leopard was shot
14. HOW MANY DAYS INTO HUNT WAS LEOPARD SHOT
15. GPS POSITION
16. SKULL LENGTH (inches): 17. SKULL BREADTH (inches)
Trophy verification: Y N (to be completed by ZPWMA)

18. ESTIMATED AGE OF LEOPARD TAKEN
i) <2 ☐ ii) 2-3 years ☐ iii) 4-6 years ☐ iv) ≥7 years ☐

Complete questions 19-20 if a hound hunt
19. NUMBER OF DIFFERENT LEOPARD CHASED
20. ESTIMATED LENGTH OF ALL CHASES COMBINED (km)

COMMENTS: WE APPLIED FOR A PERMIT AS WE HAD QUOTA AVAILABLE. CLIENT DID NOT FOLLOW UP ON OFFERS.

SECTION B: LION HUNT RETURN FORM

1. TR2 SERIAL NUMBER: 00000 79977
2. HUNTING OUTFITTER: TEGEEK TRADING (PVT) LTD
3. PROFESSIONAL HUNTER: GUY WHITTALL
4. PROPERTY/CONCESSION/CAMPFIRE AREA NAME: HUMANI
5. MINIMUM NUMBER OF DAYS BOOKED FOR LION HUNT: 14
6. i) BAIT & BLIND: ☐ ii) ON FOOT: ☐
7. i) RIFLE: ☑ ii) SHOTGUN: ☐ iii) HANDGUN: ☐ iv) BOW: ☐
8. i) SUCCESSFUL HUNT: ☑ ii) FAILED HUNT: ☐

Complete question 9 if a hunt was unsuccessful
9. WAS A LION WOUNDED DURING A FAILED HUNT: Y (N)
10. IF HUNT FAILED, WHAT WAS THE REASON?
11. TOTAL NUMBER OF BAIT NIGHTS

12. NUMBER OF LIONS RECORDED ON BAITS

Sex/Age	Number	Evidence (sighting, tracks, trail camera)
Adult male	1	VISUAL DURING THE BAIT
Adult female	5	" " " "
Subadult male	4	" " " "
Subadult female	2	" " " "
Unknown	–	" " " "

13. DATE OF HUNT START: 11-12-17
14. NUMBER OF DAYS INTO HUNT LION SHOT: 5
Complete questions 14-18 if a trophy was taken
15. GPS POSITION: UN 137 425
16. SKULL LENGTH (inches): 16" 17. SKULL BREADTH (inches): 8 5/8
Trophy verification: Y N (to be completed by ZPWMA)

18. ESTIMATED AGE OF LION TAKEN
i) <4 years ☐ ii) 4-5 years ☐ iii) ≥6 years ☑
19. SEX OF LION HUNTED: M F

COMMENTS: HOW LION WAS SHOT @ 5:30 P.M.

RCVD JUN 27 2018

D&L CHB, LLC
1500 MIDWAY CT. W201
ELK GROVE VILLAGE, IL 60007

BANK ONE
CHICAGO, IL 60670
2-1-710

DATE~ | CHECK NUMBER (b) (4)

06/18/18

PAY
**********100DOLLARS&00CENTS

CHECK AMOUNT
$100.00**

PAY TO THE ORDER OF:

FISH & WILDLIFE

IL

(b) (4)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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June 25, 2018

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

Re: Application for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three import permit applications. The first is for a permit to import a sport-hunted elephant trophy from the Mahango Game Park concession in Namibia. The Mahango area is part of the Zambezi Region of Namibia, and holds the country's largest elephant population, which is increasing. (See enclosed AfESG Status Report.) This operator, Thormahlen & Cochran, has been in business almost two decades and has carefully stewarded this concession. We will be submitted a report from this operator by separate cover. Please consider this information, as well as information in the DMA's files and submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant, who has two separate application forms, is hunting lion, elephant, and leopard on Sango Ranch in the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant and lion population in SVC and the benefits generated by regulated hunting. Please refer to that information, including the October 2016 Non-Detriment Finding and January 2016 report, describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration was not ultimately submitted in court, but it remains a sworn statement that reflects the healthy wildlife populations in SVC. Please consider all this information in making positive enhancement findings and non-detriment findings for this applicant.

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

Sincerely,

Regina Lennox

Encl:
- AfESG Status Report (2016), excerpts for Namibia and Zimbabwe
- Willy Pabst, Owner of Sango Ranch, Declaration

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

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Noble	Samuel	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Scottsboro	Alabama	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of [illegible] applicant)				
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 the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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.

(b) (6) 6/13/2018

Signature of applicant/Pri[illegible]ficer 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: 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.

Samuel Noble, (b) (6)
(b) (6)
(b) (6)
Scottsboro, AL

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

Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

(1) Loxodonta Africana, Elephant
(1) Panthera leo Melanochaita, Lion

b. Sex (if known). male + 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:

Sango Ranch, Save Valley Zimbabwe - Masvingo

b. Date wildlife is to be hunted:

June 22 - July 11 2018

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

Zambezi hunters

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:

b. Date wildlife was hunted:

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

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]:

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).

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: Winston Taylor
Business Name: Zambezi Hunters
Address: PO Box BW 1330 Borrowdale
City: Harare
State/Province: Zimbabwe
Country, Postal Code:
– Tel: 263.4.882223

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?

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?

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

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: (b)(6) Date: 6/17/2018

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).

RCVD JUL 3 2018

SAMUEL (b) NOBLE (b)
(b) (6)
SCOTTSBORO, AL (b) (6)

(b) (6)

6/13/2018
Date

PAY to the order of U.S. Fish & Wildlife Service | $ 200.00

Two hundred ——— No/100 Dollars

BB&T BRANCH BANKING AND TRUST COMPANY
1-800-BANK BBT BBT.com

For Ele & Lion Permit Signature

(b) (6)

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km², which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

Some 20 bull elephants were photographed, and there was a further unverified report of 40 elephants, near Mangwe Dam in the vicinity of Home Farm and Greystone Ranches, across the border from Francistown in Botswana (Robertson and Winch, pers. comm. in Dunham, 2015) replacing a guess of three from 2002 (Dunham & Mackie, 2002). A helicopter total count enumerated 174 elephants on Shangani Ranch near Bulawayo (Edwards, pers. comm. in Dunham, 2015) and this replaces a guess of 60 from 2001 (Dunham & Mackie, 2002).

There was a **total aerial count** of 212 elephants in 2014 in the Zimbabwe section of the Mapungubwe Transfrontier Conservation Area which includes Tuli Safari Area, Sentinel, Nottingham and River Ranches (Selier & Page, 2015). This replaces an estimate of 82 from 2001 (Dunham & Mackie, 2002).

There were **informed guesses** in 2014 of 500-600 in Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL			(km²)	LON	LAT
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Seier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

Zimbabwe

0 50 100 150 200 250 300km

ABBREVIATIONS AND ACRONYMS

Intl Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

AfESG

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CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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June 25, 2018

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

Re: Application for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three import permit applications. The first is for a permit to import a sport-hunted elephant trophy from the Mahango Game Park concession in Namibia. The Mahango area is part of the Zambezi Region of Namibia, and holds the country's largest elephant population, which is increasing. (See enclosed AfESG Status Report.) This operator, Thormahlen & Cochran, has been in business almost two decades and has carefully stewarded this concession. We will be submitted a report from this operator by separate cover. Please consider this information, as well as information in the DMA's files and submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant, who has two separate application forms, is hunting lion, elephant, and leopard on Sango Ranch in the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant and lion population in SVC and the benefits generated by regulated hunting. Please refer to that information, including the October 2016 Non-Detriment Finding and January 2016 report, describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration was not ultimately submitted in court, but it remains a sworn statement that reflects the healthy wildlife populations in SVC. Please consider all this information in making positive enhancement findings and non-detriment findings for this applicant.

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

Sincerely,

Regina Lennox

Encl:

- AfESG Status Report (2016), excerpts for Namibia and Zimbabwe
- Willy Pabst, Owner of Sango Ranch, Declaration

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

RCVD JUL 3 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	
Noble	Samuel	Edward	(b) (6) [redacted]
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

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 #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code		1.f. Country
Scottsboro	Alabama	(b) (6) [redacted]		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100. 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): 6/13/2018

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.

Samuel Noble, JR
(b) (6)
Scottsboro, AL (b) (6)

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

Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

(1) Loxodonta Africana Elephant
(1) Panthera leo melanochaita Lion

b. Sex (if known). male + 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:

Sango Ranch, Save Valley Zimbabwe - Masvingo

b. Date wildlife is to be hunted:

June 22 - July 11 2018

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

Zambezi hunters

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:

b. Date wildlife was hunted:

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

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]:

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).

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: Winston Taylor
Business Name: Zambezi Hunters
Address: P.O. Box BW 1330 Borrowdale
City: Harare
State/Province: Zimbabwe
Country, Postal Code:
– Tel: 263.4.882223

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?

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?

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

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: _____ Date: 6/13/2018

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).

RCVD JUL 3 2018

(b) (6) (b) (6)

6/13/2018
Date

PAY to the order of U.S. Fish & Wildlife Service $ 200.00

Two hundred No/100 Dollars

Photo Safe Deposit® Details on back

BB&T BRANCH BANKING AND TRUST COMPANY
1-800-BANK BBT BBT.com

For Elec. ION Permit Signature

(b) (6)

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Zimbabwe

ESTIMATED TOTAL ELEPHANTS

82,630 ± 8,589

GUESSES

1,635 - 1,805

GENERAL STATISTICS

Country Area	390,580 km²
Range Area	81,228 km² (21%)
Protected Range	61 %
Information Quality Index (IQI)	0.86
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Poaching of elephants for ivory has escalated in the past ten years and has become a major problem in Zimbabwe. A worrying recent development has been the emergence of poisoning as a poaching technique. Just over 100 elephants were killed in a single cyanide poisoning incident in Hwange National Park in late 2013 (Muboko et al., 2014). The impact of poaching has been highest in the north of the country, particularly in the Sebungwe Region to the south of Lake Kariba, and the Lower Zambezi Region (Dunham et al., 2015c). Although elephant numbers have increased in Gonarezhou National Park, it too experienced an increase in poaching in 2015 (Dunham & van der Westhuizen, 2015).

Concern has been expressed about the impact of high numbers of elephants on vegetation and other biodiversity in Zimbabwe's protected areas. Despite the increase in poaching, this remains a problem in protected areas such as Hwange NP, where the provision of artificial water supplies has led to high elephant densities (ZPWMA, 2015).

Zimbabwe published a national elephant management plan covering the period 2015 to 2020 (ZPWMA, 2015).

In 2008, Zimbabwe undertook an approved one-off sale of 3,764 kg of ivory to Japan and China, at a price of USD $487,162 (Wijnstekers, 2011).

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km^2, which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

suitable for comparative purposes (Dunham et al., 2007; Dunham et al., 2006b). Since the 2014 Botswana survey was carried out a month earlier than the north-west Matabeleland survey there is a possibility of double-counting or missing animals that had moved from Hwange into Botswana. There was a surprisingly large number of elephants seen in the Ngwasho/Sepako stratum in Botswana adjoining the southern half of Hwange NP (estimate 11,744) (Chase et al., 2015) and evidence from radio-tracking shows that elephants do move out of Hwange into adjoining areas of Botswana (Chamaillé-Jammes, pers. comm., 2016; Ferguson & Chase, 2010).

Elephant range in North-west Matabeleland has probably increased. Water hole counts and scout reports indicated 308 elephants in the Fuller Forest Land, 165 in Gwaai, Bembezi and Umguza Forest Lands (which has been marked as new **known range**) and 150 in Gwampa/Lake Alice Forest Reserves (M. Sebele pers. comm in Dunham et al., 2015a) which are all recorded as **new populations**. I. Du Preez (pers. comm. in Dunham et al., 2015a) reported an **informed guess** of 36 elephants in the privately owned Stanley & Livingstone Game Reserve (Nakavango).

The estimate for Gonarezhou NP from the 2014 survey was 11,120 ± 2,709 (Dunham & van der Westhuizen, 2015). This replaces an estimate of 4,987 ± 1,577 from a comparable 2001 survey. Another survey in 2009 gave an estimate of 9,123 ± 1,898 (Dunham et al., 2010). The elephant population of Gonarezhou NP is continuing to increase, and is at its highest level since surveys started in 1980. There was a relatively low carcass ratio of 4%. There are limited movements of elephants from Gonarezhou into adjoining parts of Mozambique, and one radio-collared elephant moved from Kruger to Gonarezhou (Henley, 2011).

The 2014 survey of the south east Lowveld included some neighbouring areas. No elephants were observed in the Malapati Safari Area immediately south-west of Gonarezhou but there was an estimate of 332 ± 519 in the Mahenye communal land to the north-east of Gonarezhou, which replaces a zero estimate from the 2001 survey. The 2014 survey gave an estimate of 1,585 ± 1,295 for the Savé Valley Conservancy. This replaces an estimate of 527 ± 310 (Dunham, 2003). There is no statistical difference between the two results. Aerial total counts were carried out in 2013 and 2015 (Jooste & Lenton, 2015; Joubert & Joubert, 2013), which did not cover the entire area; 1,538 and 1,490 elephants were counted respectively. Sengwe, further to the south-west, adjoining the northern boundary of Kruger National Park in South Africa, was not counted in the 2014 survey, but there was an estimate of 35 ± 99 in 2013 (Dunham et al., 2013). In the Malilangwe Conservancy 272 elephants were counted using a helicopter in 2013 (Clegg, 2013). This replaces an estimate of 116 from an aerial total count in 2001 (Dunham, 2002). There was an estimate of 55 in 2014 for the Chiredzi River Conservancy (Warth in Dunham & van der Westhuizen, 2015) compared to 28 in 2001 (Dunham, 2002). Although Chipinge Safari Area is marked as possible elephant range, this is now highly unlikely.

There are a number of small isolated populations in other parts of Zimbabwe, which have updated estimates for 2014. There is an informed guess of 150 elephants for Chegutu Safari Area (Mwale, pers. comm. in Dunham, 2015), formerly Hartley Safari Area, west of Harare and this replaces a guess of 100 from 2001 (Dunham & Mackie, 2002). Some 30 elephants reportedly move from the Nyatana Wildlife Management Area in the north east of the country into Mozambique and this replaces a guess of 150 from 2001 (Dunham & Mackie, 2002).

Some 20 bull elephants were photographed, and there was a further unverified report of 40 elephants, near Mangwe Dam in the vicinity of Home Farm and Greystone Ranches, across the border from Francistown in Botswana (Robertson and Winch, pers. comm. in Dunham, 2015) replacing a guess of three from 2002 (Dunham & Mackie, 2002). A helicopter total count enumerated 174 elephants on Shangani Ranch near Bulawayo (Edwards, pers. comm. in Dunham, 2015) and this replaces a guess of 60 from 2001 (Dunham & Mackie, 2002).

There was a **total aerial count** of 212 elephants in 2014 in the Zimbabwe section of the Mapungubwe Transfrontier Conservation Area which includes Tuli Safari Area, Sentinel, Nottingham and River Ranches (Selier & Page, 2015). This replaces an estimate of 82 from 2001 (Dunham & Mackie, 2002).

There were **informed guesses** in 2014 of 500-600 in Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Total Counts	484	–	–	–	1 %	819
Aerial Sample Counts	82,126	8,589	–	–	81 %	65,502
Informed Guesses	20	–	527	567	5 %	3,777
Other Guesses	–	–	1,091	1,221	10 %	8,399
Degraded Data	–	–	17	17	0 %	342
Totals 2015	**82,630**	**8,589**	**1,635**	**1,805**		
Totals 2006	**93,122**	**7,068**	**534**	**625**		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
Total Range					100 %	81,228

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	-10,320	±11,124	0	0	79 %	63,868
New Population	0	0	+713	+713	6 %	4,563
Different Technique	+7	±99	-145	-145	4 %	3,370
Different Area	+20	0	-3	+36	0 %	33
New Guess	-182	0	+519	+559	8 %	6,662
Data Degraded	-17	0	+17	+17	0 %	0
Totals	-10,492	±11,124	+1,101	+1,180	97 %	78,839

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Aerial or Ground Total Counts	819	0	819
Direct Sample and Reliable Dung	65,375	127	65,502
Informed Guesses	3,745	32	3,777
Other Guesses	8,741	0	8,741
Unassessed Range	1,533	857	2,389
Totals	80,213	1,016	81,228

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Selier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

ELEPHANT ESTIMATES (CONT.)

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON	LAT
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,366	28.2°E	17.4°S
North Gokwe Communal Lands	RS	AS	B	2014	0	21	Dunham et al., 2015b	2	3,096	28.2°E	17.4°S
Sijarira Forest Area	RS	AS	B	2014	16		Dunham et al., 2015b	3	261	28.2°E	17.4°S
Shangani Ranch	NG	O	E	2014	174		Dunham, 2015	2	628	29.3°E	19.6°S
Southeast Lowveld											
Bubiana Conservancy	NG	O	E	2014	100		Dunham, 2015	2	1,772	29.8°E	21.1°S
Bubye Valley Conservancy	NG	O	E	2014	500	100*	Dunham, 2015	1	2,895	30.1°E	21.5°S
Chiredzi River Conservancy	DT	O	E	2014	55		Dunham, 2015	2	895	31.6°E	20.8°S
Gonarezhou National Park	RS	AS	B	2014	11,120	2,709	Dunham & van der Westhuizen, 2015	1	4,941	31.9°E	21.5°S
Mahenye Ward	RS	AS	B	2014	332	519	Dunham & van der Westhuizen, 2015	3	221	31.9°E	21.5°S
Malapati Safari Area	RS	AS	B	2014	0		Dunham & van der Westhuizen, 2015	3	177	31.9°E	21.5°S
Malilangwe Conservancy	RS	AT	A	2013	272		Clegg, 2013	3	425	31.9°E	21.1°S
Matibi II Communal Lands	-	AS	E	1996	0		Davies et al., 1996	3	400	31.7°E	21.5°S
Nuanetsi Ranch	NP	O	D	2014	54		Dunham, 2015	2		30.8°E	21.6°S
Save Valley Conservancy	RS	AS	B	2014	1,585	1,295	Dunham & van der Westhuizen, 2015	2	3,496	32.1°E	20.4°S
Sengwe Communal Land	DT	AS	B	2013	35	99	Dunham et al., 2013	2	2,488	31.8°E	21.6°S

*RANGE OF INFORMED GUESS

KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

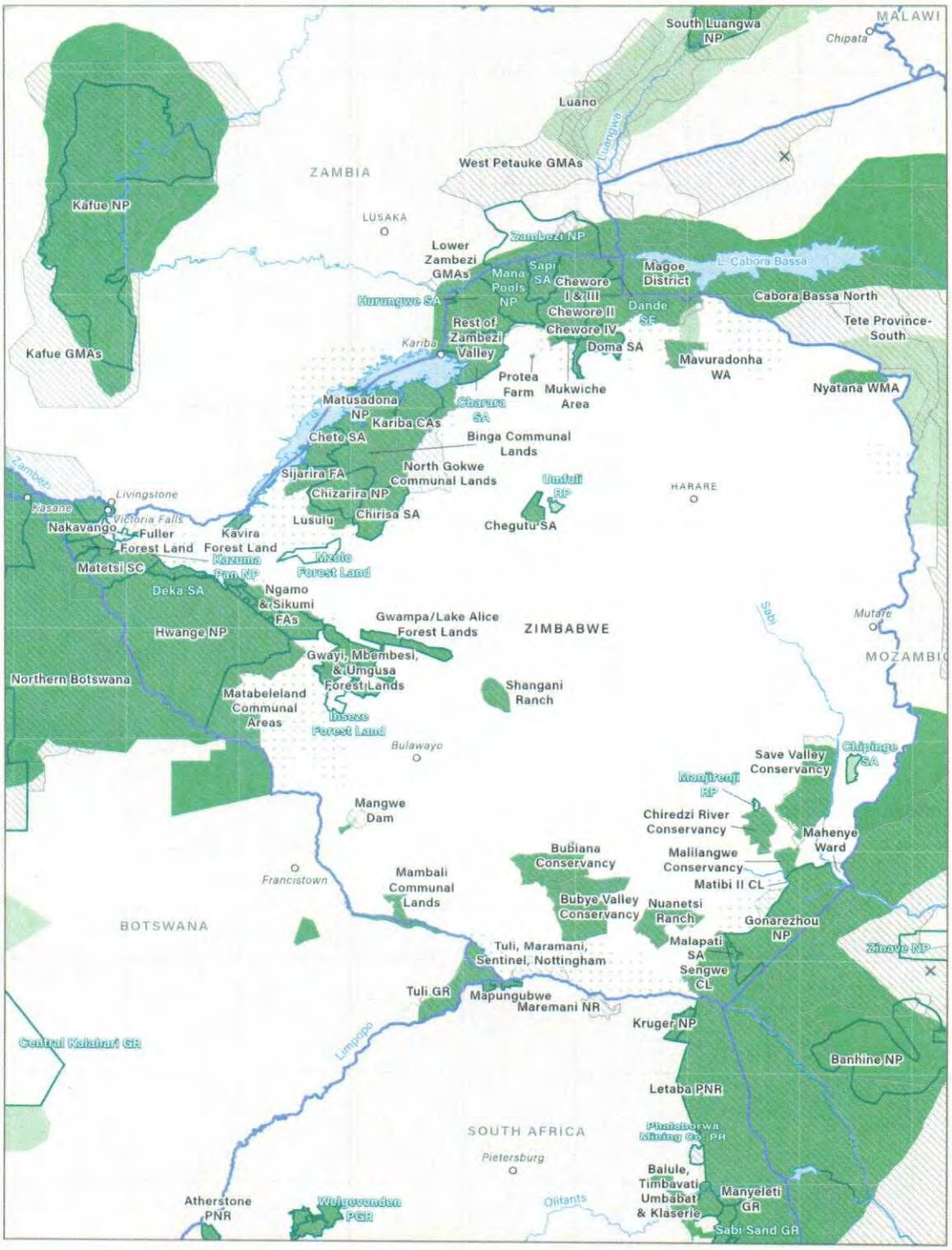
KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Zimbabwe



0 50 100 150 200 250 300km

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

AfESG
© 2016 African Elephant Specialist Group

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RECD JUL 31 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

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

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Shreveport	Louisiana	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
Same as above		Darbi Rice	(b) (6)	
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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): 07/18/2018

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.

Fedex envelope enclosed

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

Darbi Rice (b) (6) [redacted]

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name:

   Panthera leo, 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:

   b. Date wildlife is to be hunted:

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

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:

   Area - South Eastern Lowveld, Zimbabwe; Region - Masvingo Province. GIS coordinates - 962143; Ranch - Senuko Ranch; Conservancy - Sa valley; Hunting block - Senuko 2; Nearest city - Chiredzi town

   b Date wildlife was hunted:

   1-6-18

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

Clive Hallamore
Hallamore Hunt

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]:

Trophy Consultants International

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). see attached permit

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: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
City: Belmont
State/Province: Bulawayo
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?

Please see attached SVC carnivore survey

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?

1500/day x 21 days + 16,000 trophy fee. All fees are p back into the hunting area in the form of running costs such as staff wages, water, power, fuel, anti-poaching, rd Mainten etc.

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

Other hunts are also done in th area which fund the above which benefits all specie including lion. The Senuko Ranch also partners with th local community which helps with poaching pressure etc

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: _____ Date: 7-18-18

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).

Any additional questions please call Kevin Short with Hallamore Hunt

(b) (6) [redacted]

or

Email Glenn (b) (6) [redacted]

He is the Senuko Ranch Operator.

Thank you.

001706

050.....

NPAITTES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL:.....
PHL 26
Amount paid $400
Date 14-12-17
Rec H10R072020

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to .....

of .....

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section Senuko 2 of the Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18 and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
Antbear	2		Duiker (m)	3		Hare	1	
Baboon	10		Eland (m)	3		Honey badger	2	
Buffalo (f)	2		Elephant (m)	1		Hornbill	1	
Buffalo (m)	10		Elephant (T/L	1		S. Hyaena	2	
Bushbuck (m)	1		Francolin	2		Impala (m)	20	
Bushpig	3		Geese	1		Klipspringer (m)	2	
Caracal	1		Genet	4		Kudu (m)	5	
Civet	3		Giraffe (m)	3		Lion (m)	1	
Cobra	1		Grysbok (Sharpe's) (m)	2		Leopard (m)	1	
Dassie	2		Guinea fowl	2		Mongoose	2	

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*
(*Designation* AREA MANAGER)

.....
for Finance Manager

.....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*
(*Designation* ADCS)

Printed by Printflow (Private) Limited.

Parks and Wildlife Management Authority which issue the permit
MANAGEMENT SERVICES-CONSUMPTIVE
02 JAN 2018
HEAD OFFICE
P.O BOX CY 140 CAUSEWAY HARARE
TEL: (04) 707 624-9 / 792783-7

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000080404
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Senuko Ranching (Pvt) Limited	Client's Full Name	Brandon Trey Morris
ZTA (HOP) No.	HOP0302	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	Glenn Stockil P Bag 7138 Chiredzi glenns@senuko.com	Address	(b) (6)
Name of Professional Hunter	Clive Hallamore	Licence No.	418
Telephone		Fax	0
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	TCI EXPORTERS	Address	BULAWAYO
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Senuko 3	Masvingo	
2	Senuko 2	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	25-05-2018
Date of Safari To	14-06-2018
Daily Rate Charged For Big Game USD	1,500.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

PARKS & WILDLIFE MANAGEMENT AUTHORITY
SOUTHERN REGION
ZPWMA
25 MAY 2018 Date Stamp
SAVE VALLEY CONSERVANCY
P.O. BOX 121 BIRCHENOUGH
TEL: 0392263115/4

African Wildlife Conservation Fund

Savé Valley CONSERVANCY

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, 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 carnivores within 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) with strong correlations existing 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 2017 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.

AWCF head scout, Rueben Bote, and attachment student, Nkosilathi Ngwenya, identifying spoor.

Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (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 6-7km^2 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.

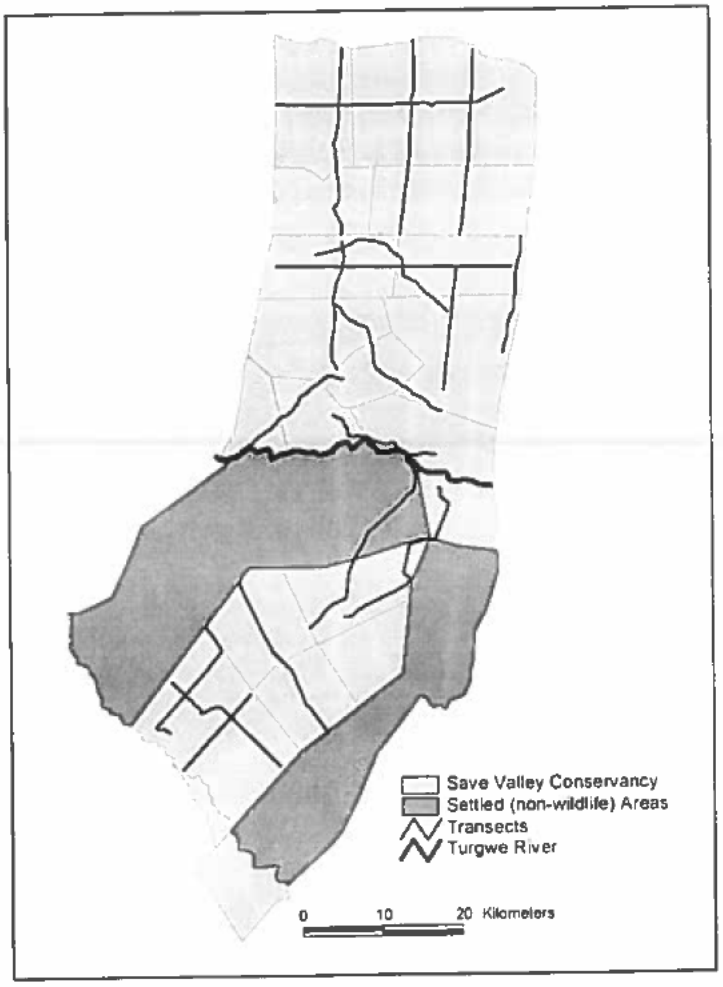
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.7 km, giving a penetration ratio of 6.31. In southern SVC, the combined transect length was 144 km, giving a penetration ratio of 5.56. For the conservancy as a whole, 403.7 km were driven (penetration ratio 6.04).

Transects surveyed were the same as those used in 2007-2017 (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 12.7 km and 29.2 km in length, with a mean transect length of 21.2 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 2017



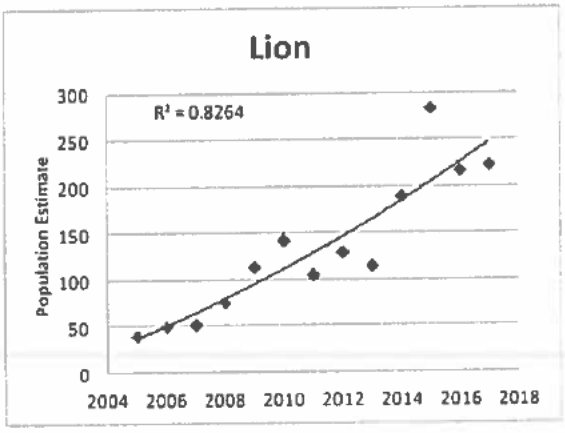
Results

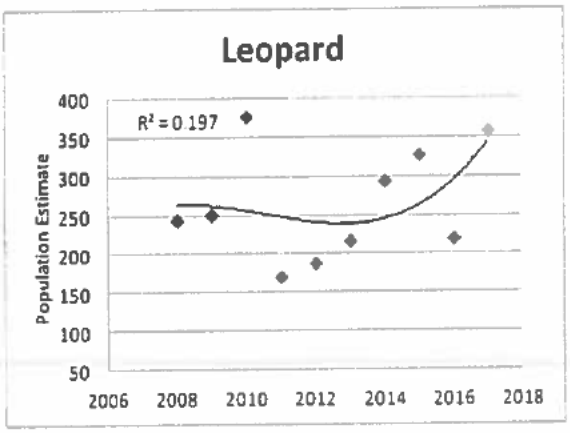
Table 1: Summary of survey parameters (2017)

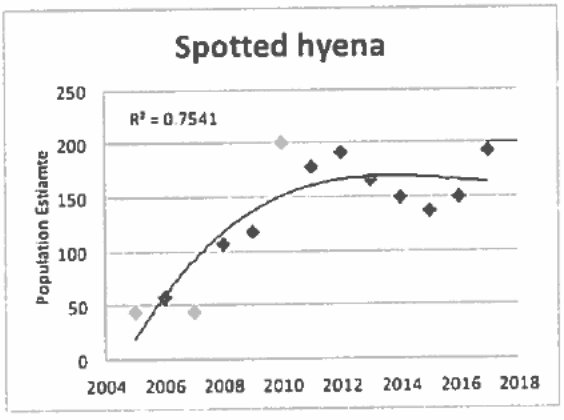
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km²)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

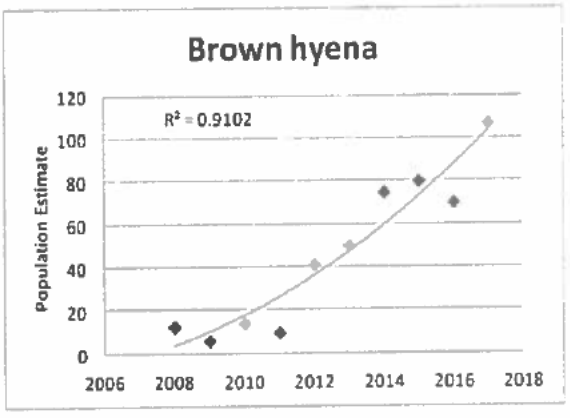
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223
Leopard				245	252	378	172	189	218	295	328	221	359
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193
Brown hyena				12	6	14	10	41	50	75	80	70	107
African Wild dog				45	60	64	61	86	90	81	91	99	94
Black backed jackal				188	190	157	141	151	199	229	241	234	296









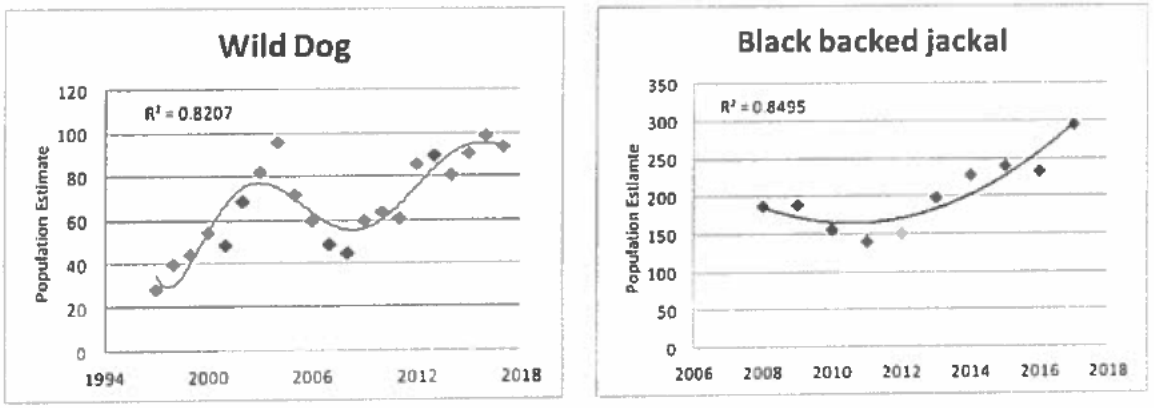


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results for each species are stable/increasing. The trend data suggests that 2016 was a slight undercount for all species (as was also the case in the Gonarezhou National Park survey), and that 2015 was most likely an over count for lion (and maybe for leopard).

Interpretation of results for each species

The lion population in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to be starting to stabilise. The population **estimate of 223 lions** in 2017 is in keeping with the long-term population growth trend (Figure 2), and the recent marginal increases in estimated individuals could be indicative of a slowing growth rate as the species approaches capacity within the conservancy.

The number of lions in SVC equates to a **density of 9.1 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 121 lion tracks we encountered, 31% were adult males, with 55% identified as adult females, 12% as sub-adults and 2% as young cubs. 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.

In 2017 there were an estimated **359 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2010 – 2017 (inclusive), it is clear that the conservancy's leopard population is displaying a good and positive trend (Figure 2).

Leopards are at a **density of 14.7 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (9.5 / 100km²; Groom & Watermeyer 2017). Finally, the SVC leopard population appears to displays a 2:1 ratio skewed in the favour of females. Of the 85 leopard tracks

we recorded, 32% were adult males, 64% were adult females, with one sub-adult (1%) being recorded and three cubs (3%).

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. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. There were an estimated **193 spotted hyenas** in 2017. The hyena population could be doing better in light of the recently stabilising lion population, but we will need to monitor the population to determine if a true trend is emerging. Likewise, one must not overlook that the possible causes of the recent slight population decline between 2012-2016 (prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc.) may still be of consequence.

Spotted hyena's are at a density of **7.9 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 9.7 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2017). Given the relatively lower density of the species in the conservancy, they may still increase more.

There were an estimated **107 brown hyenas** in the conservancy in 2017. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **4.4 brown hyenas / 100km²** in 2017, which is higher than the average (2.5 brown hyenas / 100km²) over the last few years (2012-2015).

The **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 94 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 313 wild dogs in the conservancy, with a density of 12.8 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

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, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time.

There has been a notable increase in the **black backed jackal** population in the conservancy, from an estimated 241 jackals in 2015 and 234 jackals in 2016, to **296 black backed jackals** in 2017. Overall, the jackal population is displaying a stable positive growth trend (Figure 2). The estimated density of jackals was **12.1 jackals / 100km²** in 2017.

We once again stress, that the spoor encounter rate for **cheetahs** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetahs, even with large confidence intervals. However, data from the spoor survey suggests there to be a minimum of **four cheetahs** in the whole

conservancy at a **density of 0.2 cheetahs / 100 km²**. This is on the low end of the spectrum when one considers the range of cheetah densities elsewhere (excluding highly managed fenced reserves in South Africa); for example, 0.2 cheetah / 100km² on Namibian farmlands and in the Sahara, and up to 2.5 cheetah / 100km² in the Serengeti National Park (IUCN/SSC 2015).

Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low (only two cheetah tracks were seen in the 403.7 km of transects driven). However, spoor surveys are not 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 collected updated photographic information on cheetah throughout Zimbabwe, estimates c. 12 adult cheetahs in SVC (van der Meer, 2016).**

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, although anomalous over and undercounts can hinder this. Likewise, we can trust the numbers for wild dogs, as they are from the detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give 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, using population figures directly from the graphs for these species is unadvisable.

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Acknowledgements

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Appendix 1: All Spoor Survey Results for All Species Counted (2017)

NORTH SVC Species	Survey Area North 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	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421

SOUTH SVC Species	Survey Area South 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	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	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	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

DOCUMENT IS PRINTED ON CHEMICALLY REACTIVE PAPER - THE BACK OF THIS DOCUMENT INCLUDES A TAMPER EVIDENT CHEMICAL WASH WARNING BOX

THE BACK OF THIS DOCUMENT INCLUDES MICROPRINTED ENDORSEMENT LINES

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Bossier City, Louisiana 71171-6266

84-352/1111

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7/17/2018

PAY TO THE ORDER OF U.S. Fish and Wildlife Services $ **100.00

One Hundred and 00/100********** DOLLARS

U.S. Fish and Wildlife Services

VOID AFTER 120 DAYS

MEMO Brandon T. Morris lion permit application

AUTHORIZED SIGNATURE

[redacted] (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD AUG 03 2018 LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Webster	Jason	C	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Houston	Texas	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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)

07/24/2018

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 a trophy 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 4-6 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)?

   Same as applicant or Rosi Barraza at (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Lion - Leo Melanochaita

   b. Sex (if known). Unknown

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:

      Zambia; Nkala game Management area; Kaflie Valley Region; Nearest Town: Itezhi Tezhi; GIS Coordinates of area HQ - S15'54.520' E026'00.233

   b. Date wildlife is to be hunted:

      July 21, 2018 - Aug 10, 2018

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

      Westgate Properties Ltd

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

   b. Date wildlife was hunted:

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

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 foreign export/re-export document]:

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).

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: Mike Borman
Business Name: Bangweulu Taxidermy Limited
Address: 4142/K Chifwema Road
City: New Kasama Lusaka
State/Province: Zambia
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Unknown

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, local community, or government?

Unknown

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Unknown

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

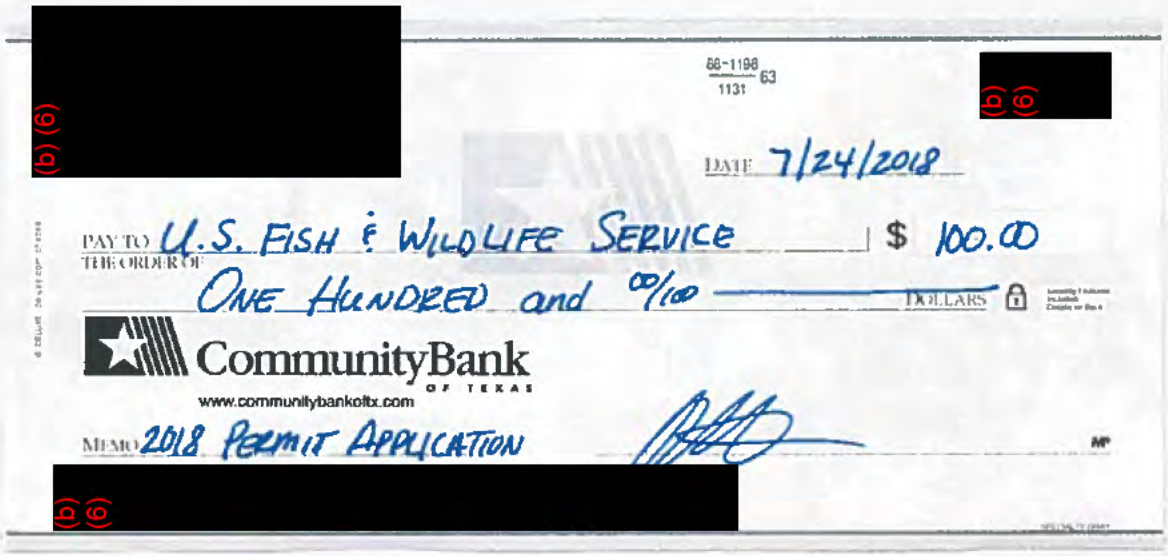
11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 7/24/2018

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 governments 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 shipments 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).


(b) (6)
88-1198
1131
63
(b) (6)
DATE 7/24/2018
PAY TO THE ORDER OF U.S. FISH & WILDLIFE SERVICE
$ 100.00
ONE HUNDRED and 00/100
DOLLARS
CommunityBank
OF TEXAS
www.communitybankoftx.com
MEMO 2018 PERMIT APPLICATION
(b) (6)

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000586

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 13/7/18 .....

DETAILS OF PERMIT HOLDER

Full name: Webster Jason Charles ..... NRC/Passport No:..... (b) (6) [redacted]

Tel/Mobile No.:..... E-mail address.....

Postal Address: Box 39072 Lsk ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 912 ..... 2. ..... 3.....

Calibre(s) 1.: 375 ..... 2. 300 ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0000902 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lsepande .....

..... Upper Lsepande .....Game Management Area,

to..... 13/8/18 ..... (Dates inclusive) .....Hunting block for ..21.....days from..... 20/7/18

Amount Paid..... $150 .....

GRZ Receipt No..... 0043561 .....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
13 JUL 2018
LICENSING
PRIVATE BAG 1, CHILANGA, ZAMBIA.

Official Stamp .....

..... Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Original

NPW FORM 2

S/No. 0000607

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 18/6/18

DETAILS OF LICENSEE

Full Name: J. WEBSTER NRC No./Passport No.: (b) (6) [redacted]

Nationality: USA Age: 43

Tel/Mobile No: c/o WESTGATE E-mail: c/o WESTGATE

Full Name of Safari Company: Westgate Properties

Certificate of Incorporation No. Date of Incorporation

Postal Address: Box [illegible] Residential Address

Firearm Licence/Tourist Firearm Import No. 712 Calibre of Firearm: .375

Type of Hunt: CLASSIC

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Upper Lupande 0000123 7363948	2018	H200
/					/

Total Animals fees paid - the kwacha equivalent of US$ H200
Concession Fees paid - the kwacha equivalent of US$ /
Grand Total the kwacha equivalent of US$ H200

Official Stamp

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
18 JUN 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

ORIGINAL

NPW FORM 12

S/No. 0001607

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: MR MICHELSON

Residential Address: 2667 MUSIKILI RD LHILL LSK NRC/Passport No. (b) (6)

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: WESTGATE SAFARIES

DETAILS OF CLIENT

Name of client: JASON WEBSTER

Tel/Mobile No. C/O WESTGATE NRC/Passport No: (b) (6)

Postal Address C/O WESTGATE Nationality:

Type of Licence: CLASSIC Residential Add (b) (6) RICHMOND TX USA

Date of Issue: 13/7/18 Licence No.:

Name of Hunting Block where hunting was conducted: Place of Issue CHILANGA

Hunting period From 2017/18 To 11/8/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
5/8/18	BUFFALO	M	1		13.01256 32.03189	✓		N/A
7/8/18	LION	M	1		13.00578 32.08435	✓		0000816
6/8/18	IMPALA	M	1		12.99913 31.47004	✓		0000607
4/8/18	CROCODILE	M	1		13.05949 31.84604	✓		0000943
								0000622

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
BUFFALO			36"	
LION			23 1/4"	
IMPALA			20 1/2"	
CROCODILE	13.8"			

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated ~~and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.~~ N/A AS PER PHAZ INSTRUCTION

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence ~~and that the total foreign currency stated above is the full amount paid by the client for the hunt.~~ N/A AS PER PHAZ INSTRUCTION.

Date 11/8/18 Signature of Client

Date 11/8/18 Signature of Professional Hunter

Date 11/8/18 Name of Wildlife Police Officer LANCE MUMBE

Employment No. of W.P.O 27118

Signature of W.P.O

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 13 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Ellington	Scott	Byron	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dallas	TX	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
N/A				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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.

X _____ 8/1/2019

Signature of applicant/Principal Officer 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: 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.

Scott Ellington
(b) (6) Dallas, TX (b) (6)

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

Sarah Bell Goldsmith
(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. (Pardus. Member of the Felidae) African Lion.

b. Sex (if known). Male as females are Not allowed to be harvested in Tanzania

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:

N/A

b. Date wildlife is to be hunted:

N/A

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

N/A

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:

Tanzania. (Area: KIZIGO GAME RESERVE; Region: SINGIDA; GPS: S06.47'67.4", E 034.33'58.1"; Hunting Block: KIZIGO GAME RESERVE CENTRAL; Nearest City: SINGIDA)

b. Date wildlife was hunted:

10/10/2017 (October 10, 2017)

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

Safari Company: PALAHALA SAFARIS & HUNTING LTD; BLOCK DD, PLOT # 191; NAIROBI ROAD, SAKINA AREA; ARUSHA-TANZANIA

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]:

Tanzania Big Game Safaris Ltd and Affiliates
Block DD /Plot 191, Nairobi Road/Sakina Area, Arusha, Tanzania

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).
Attached

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:	Mr. Webby Kapaliswa
Business Name:	Tanzania Big Game Safaris, Ltd/
Address:	Block DD /Plot 191
City:	Nairobi Road/Sakina Area
State/Province:	Arusha, Tanzania
Country, Postal Code:	

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. Addtl. info attached

a. Do you have any information regarding the population status or trend data on the species hunted?

Over the last few seasons, the outfitters have obtained conclusive data that shows a more than thriving population in the majority of our hunting areas. Population is very healthy and on the increase

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?

Tanzania Big Game Safaris and affiliates are associated with an NGO that is called Conservation Foundation Tanzania. Work hand in hand with neighboring villages that are adjacent to the concession areas by educating villagers, building schools, health care needs, finding jobs, etc.

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

Tanzania Big Game Safaris has been operating since 1988. The managing director has always been extremely active in Wildlife Conservation. He employs over 5 active anti-poaching teams with over 50 anti-poaching officers that protect a single area. He limits harvesting to male lions over the age of 8

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: X _____ Date: 8/1/18

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).

Department of Interior
US Fish & Wildlife Service

Federal Fish and Wildlife Permit Application Form
Form 3-200-20

Mr. Scott Byron Ellington

9. Additional information provided below:

The affiliate companies along with Tanzania Big Game Safaris are all under one-management agreement with Tanzania Big Game Safaris.

Tanzania Big Game Safaris has been operating in Tanzania since 1988. Since its inception, the founder and managing director is Raoul Ramoni. Raoul has always been extremely active in Wildlife Conservation. He has always been a true custodian of the land and wildlife. In addition, he has a very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employs over five active anti-poaching teams with over 50 anti-poaching officers that are protecting a single area. They protect this particular area from illegal poachers, woodcutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserves. Due to the very stringent wildlife management program, these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas, there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been properly managing the areas. Thus, this dramatically limits the harvesting of male lion to only an older more mature male typically over the age of eight years and that is no longer a residing pride member.

Tanzania Big Game Safari's policy targets old lone (Nomad) males that no longer breed and are not associated with any prides with females and/or cubs. The lions that they have harvested in the past have all past the aging process in Tanzania, since its inception.

The numbers of lions that are visible on a normal safari are very impressive. Quite often on a 21 days safari, everyone involved will have the pleasure of sighting between 20 and 35 male lions. Over the last few seasons, they have obtained conclusive data that shows a more than thriving population in the majority of their hunting areas, with the exception of Masailand. Subsequently, the lion populations, due to this very strict management practice, are very healthy and there are a significant amount of lions on the increase. Tanzania is fortunate enough to have the highest density of lion population in Africa. Since 2012, Tanzania put in place a law that would only allow lions over 6 years of age to be hunted. It has been a common practice for our Companies for the last 15 years, not to harvest any males that are younger than 7 years of age.

Tanzania Big Game Safaris and affiliates are associated with an NGO (non governmental organization) that is called Conservation Foundation Tanzania. This has been very active in Tanzania (in many different capacities) since 1994. It is fortunate to be able to work hand in hand with neighboring villages that are adjacent to the concession areas. Educating villagers neighboring these concession areas is a huge advantage in protecting the wildlife living within these eco-systems. Local people are taught that they have the opportunity of finding available jobs with the hunting outfitter whom is managing the concession areas. In addition, the outfitter is able to help the villages with different community projects based on their needs such as building schools for the different ages of the children irrespective of their religion. Another example is the possibility of health care needs such as wheel chairs and medical supplies. School supplies and awareness of potential sponsors for individual students to be able to continue to further education are just a few examples of the benefits

O.A-7418-M

September 26, 2017 12:18:28 pm

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

Safari Date: Sunday, September 24, 2017

Permit Return Date: Saturday, November 4, 2017

ADDITIONAL INTER-COMPANY HUNTING PERMIT PERMIT NO **8885031** MAIN PERMINT NO. **2008225**

Station ARUSHA Date of Issue 23-September-2017 Date of Expiry 14-October-2017 Package Type 21 DAYS

This RESIDENT'S / VISITOR'S Permit is Granted to SCOTT BYRON ELLINGTON of Address NO MATCH

Who holds Weapon (Type) RIFLES Calibre .375/.458/.31 Maker's Number (b) (6) C.A.R Number -

Licence Number (b) (6) Dated 12-Sep-17 Issued At ARUSHA Weapon owner & Address SCOTT BYRON ELLINGTON

and entitles him to hunt the below animals in the (Game area and blocks) KIZIGO GR C

owned by PALAHALA SAFARIS AND HUNTING LTD

Parent Company: MUHESI SAFARIS LTD

PH MR. WEBBY KAPALISWA.

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
BABOON YELLOW	2	
BUFFALO AFRICAN CAPE	3	
BUSHBUCK CHOBE	1	
BUSHPIG	1	
CIVET AFRICAN	1	
DIKDIK KIRK'S	1	
DUIKER COMMON	1	
DUIKER HARVEY'S RED	1	
ELAND LIVINGSTONES	1	
HARTEBEEST LICHTEINSTEIN'S	2	
HYAENA SPOTTED	1	
IMPALA SOUTHERN	2	
JACKAL SIDE STRIPED	1	
KLIPSPRINGER	1	
KUDU GREATER	1	
LEOPARD	1	
LION	1	
ORIBI COMMON	2	
RATEL (HONEY BADGER)	1	
ROAN ANTELOPE	1	
SABLE ANTELOPE ROOSEVELT	1	
SERVAL CAT	1	
STEINBUCK	1	
WARTHOG	2	
WATERBUCK DEFASSA	2	
ZEBRA BURCHELL'S	2	

Signature of Holder

Signature of Issuing Officer & Official Stamp

THE DIRECTOR OF WILDLIFE
26 SEP 2017
ISSUED AT ARUSHA

NOTE

1. This permit permit must be surrendered to a Licensing Officer of the Game Division or Managing Director within 15 days of its expiry or immediately the Professional hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on the business of a Trophy dealer .
3. The maximum number of animals must not be exceeded without the written authority of the Director of Game
4. The Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer or sell.
5. A Professional Hunter conducting a safari must get a guide or letter of authority to go out alone from the Regional Game Officer
6. For weapon indicate the heaviest rifle in the case of big game or shotgun in the case of birds.
7. **The client SHOULD NOT exceed the number and species specified in the given Safari Package. Anything contrary is an offence under Section 47(b) (ii) of Wildlife Conservation Act 2009**

GAME KILLED (INTER-COMPANY)

WILDLIFE DIVISION

MINISTRY OF NATURAL RESOURCES AND TOURISM

September 21, 2017 5:40:30 pm

PERMINT NO. 8885031

PARENT COMPANY MUHESI SAFARIS LTD

2008225

PH NAME MR. WEBBY KAPALISWA,

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

CHILD COMPANY PALAHALA SAFARIS AND HUNTING LTD

GAME AREA KIZIGO GR C

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
DUIKER COMMON	ONE	KIZIGO CENTRAL	.300	1/10/17	17:27	M	S06 .58308 E034.55502		3½"
ELAND.	ONE	KIZIGO CENTRAL	.375.	2/10/17	12:36	M	S06. 46027 E034. 75365		34"
SABLE	ONE	KIZIGO CENTRAL	.300	7/10/17	16:14	M	S06. 39050 E034. 52169.		38½"
LION.	ONE	KIZIGO CENTRAL	.375	10/10/17	06:35	M	S06. 47647 E034. 32581.		SKULL 23½"
KLIPSPRINGER	ONE	KIZIGO CENTRAL	.300	11/10/17	15:12	M	S06. 39985 E034. 36687.		3½"
IMPALA.	ONE	KIZIGO CENTRAL	.300	13/10/17	09:10	M	S06. 58309 E034. 35305.		22"
GREATER KUDU	ONE	KIZIGO CENTRAL	.375	13/10/17	12:14	M	S06 57496 E034. 30485.		52"

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

26 SEP 2017

ISSUED AT ARUSHA

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit.

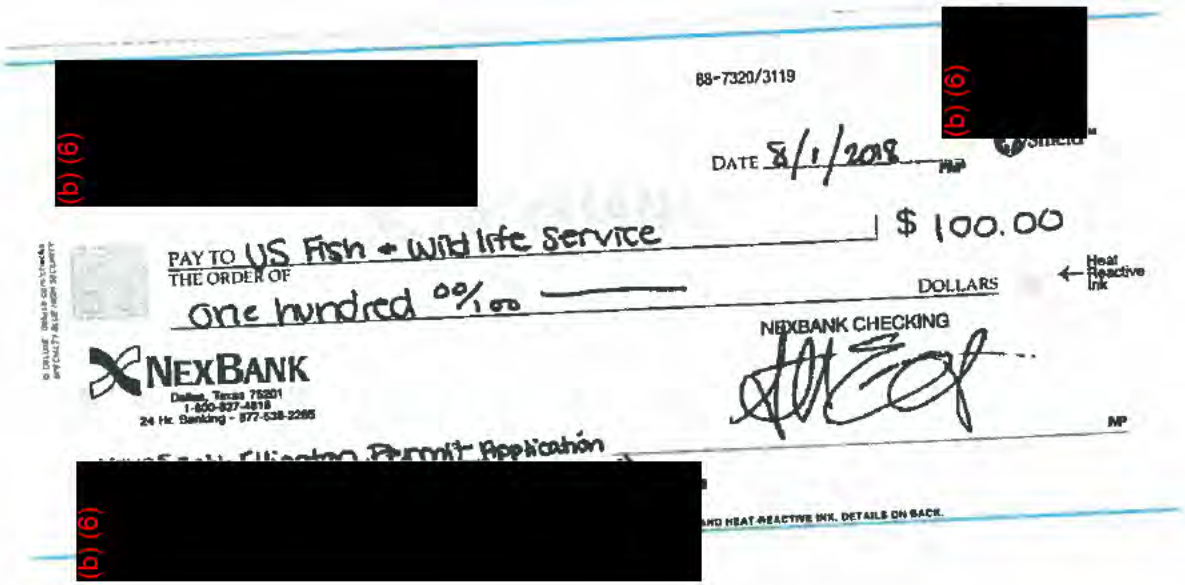
SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

For. PROJECT MANAGER
RUNGWA/KIZIGO/MUHESI
P.O.BOX 128 MANYONI

13.10.2017


(b) (6)
88-7320/3119
(b) (6)
DATE 8/1/2018
PAY TO US Fish + Wild life Service
$ 100.00
THE ORDER OF
one hundred 00/100
DOLLARS
Heat Reactive Ink
NEXBANK CHECKING
NEXBANK
Dallas, Texas 75201
1-800-627-4818
24 Hr. Banking - 877-538-2265
(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Wade	Mark	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

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 #, no P.O. Boxes)			
(b) (6) [redacted]			
1.c. City: Fairbanks	1.d. State: Alaska	1.e. Zip code/Postal code: (b) (6) [redacted]	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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

Aug 3, 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.

Mark Wade
(b) (6)
Fairbanks, Alaska (b) (6)

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

Mark Wade
(b) (6)
Fairbanks, Alaska (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.

4. 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

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:

N/A

b. Date wildlife is to be hunted:

N/A

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

N/A

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:

Zimbabwe / Masvingo Province
Area / Save Valley Conservancy , Msaise Ranch
Nearest City / Masvingo GIS VC 810719
GIS VC 810719

b. Date wildlife was hunted:

23 June 2018

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

DesFountain & Jones Safaris Pvt/Ltd
PH Dale DesFountain PH licence number 90

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]:

Harare / Zimbabwe

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).

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:	Lyn Duncan
Business Name:	LD Forwarding Co. Ltd
Address:	P.O.Box GD 467 , Greendale
City:	Harare
State/Province:	Zimbabwe
Country, Postal Code:	

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?

Populations are in Excess of carrying capacities, Wildebeest , Zebra and Eland numbers are depleting because of the booming lion populations. Please see attached page

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?

Please see attached page. I have no information how specifically the funds were used.

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

A team of 38 permanent Game Scouts are employed to curb poaching. Several community projects are being funded by the safari operator, with focus on school support and education teaching wildlife management and conservation. There are also agricultural projects going on to help add a source of employment income to families. See attached.

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: _____ Date: 8/3/2018

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).

Dallas / Ft. Worth, Texas

(b) (6) [redacted]

DFW Airport, Texas

(b) (6) [redacted]

(b) (6) [redacted]

Mark Wade
(b) (6)
Fairbanks, Alaska(b) (6)

July 20, 2018

Re: Question 9 on Federal Fish and Wildlife Permit Application Form

I hunted African lion with Desfountain Safaris from June 20 to June 24 in the Save Valley Conservancy in the Msaise Ranch of the Masvingo Province. During that time, we saw several lions including many mature male lions. Indeed, in my opinion, that area had too many lions as we saw tracks everywhere it seemed. I harvested a 9-10 year old male lion on June 23, 2018. We saw several mature male lions during this hunt.

Every night we heard lions roaring near our camp coming from several different directions, and they had a female lion living in the area coming into the skinning area at night looking for food. In the time we were there, we did not see this female lion come into camp, but we saw photos. But we did see lions while driving around, and tracks were seen around several waterholes frequently. As the outfitter used motion detector cameras to monitor the animals, we frequently saw pictures of groups of females and several males in both groups and alone. According to Mr. DesFountain, their wildebeest, eland, and zebra populations are in decline because he feels an over-population of lions. Based on my observations, I would agree. There clearly was a lion presence in this area.

My fee for this hunt was $45,000. A portion of this fee went to the Save Valley Conservancy Fund, as well as taxes for the Zimbabwe government. You would have to contact Mr. Desfountain about the specifics of how much the Conservancy Fund receives for this type hunt.

In terms of other activities for conservation, this outfitter pays considerable monies to operate an anti-poaching program to prevent illegal taking of game. We often encountered men walking the roads who were making routine checks for poachers or illegal activities. We delivered food to the outer camps where the rangers stayed, as well as brought working radios to them to insure communications. Snares were found periodically as we walked through the brush, and of course these snares were destroyed. The area is flown frequently with an airplane and drones to take game counts and monitor animal movements. They employ 38 full time anti-poaching scouts walking the perimeter and areas.

All in all, I was very impressed in how this operation worked with the local population as well as spending considerable resources to protect their wild game and prevent poaching. Fundings for school education on wildlife conservancy and support for local farms to provide employment to the people in that area appeared ongoing.

Another regular activity we observed was to insure water pumps from the Save River were operating as we often stopped to turn off and turn on water pumps into the water holes to guarantee water was available to the local game. These activities, although time consuming, supported both the predators and other species of a viable and valuable water resource. This outfitter had several dozen water pumps, solar pumps, and miles of pipeline to support and repair to maintain this operation.

My impression is that with the activities we witnessed, this particular area of Zimbabwe is doing quite well in protecting and supporting the wildlife there, and recognizes that resources and time are required to sustain and conserve the great wild species of animals we saw. As they continue to monitor the

animal populations subject to lion predation, a possible increase in permits may be required in the future.

Please feel free to contact me for any further information or help you might need to gather facts concerning the lion populations in this region of Zimbabwe.

Many thanks.

Mark Wade
Fairbanks, Alaska

050 001711

NP/CITES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

PHL:
PHL 29
Amount Paid$400
Date 20-12-17
Rec no. H10R072043
(payment details)

ORIGINAL

VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

HUNTING PERMIT

PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to A Tshabangu

of Msaise

and co-hunter ....

of ....

Firstly to hunt in Hunt Number or Section Msaise of the Masvingo

.... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18

and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
Antbear		1	Francolin		700	Klipspringer		1
Baboon		20	Goose		300	Kudu (m)		15
Buffalo (m)		15	Genet cat		5	Leopard (m)		1
Bushbuck (m)		10	Giraffe (m)		7	Lion (m)		1
Bushpig		40	Grysbok (m)		2	Mongoose		2
Caracal		2	Guinea fowl	1000		Nyala (m)		2
Civet cat		6	Hippopotamus		1	Pigeons/ Doves		2000
Duiker (m)		8	Honey Badger		2	Porcupine		3
Eland (m)		8	S. Hyena		2	Sable (m)		1
Elephant (m)		2	Impala (m)		100	Serval		5
Elephant T/L		2	Jackal S/S		10	Warthog (m)		30
Waterbuck (m)		5	Wildcat		5	Wildebeest (m)		25
Zebra		25	xxxxxxxxxxxxxxxxxxxxxxxx			xxxxxxxxxxxxxxxxxxxxx		

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

Parks & Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
02 JAN 2018
HEAD OFFICE
P. O BOX CY 140 CAUSEWAY HARARE

....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(*Designation* AREA MANAGER)

....
for *Finance Manager*

....
for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(*Designation* ADCS)

Printed by Printflow (Private) Limited

050 001711

NP/CITES FORM 10

This permit is not valid (in the case of issue by the Head Office of the Zimbabwe Parks & Wildlife Management Authority) unless payment is reflected in cash register figures in this box (See paragraph 18 on reverse)

ORIGINAL
VALID AS AUTHORITY TO HUNT

PHL: PHL 29
Amount Paid$400
Date 20-12-17
Rec no. H10R072043

(payment details)

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
HUNTING PERMIT
PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to A Tshabangu

of Msaise

and co-hunter ....

of ....

Firstly to hunt in Hunt Number or Section Msaise of the Masvingo

.... Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01-01-18

and 31-12-18 (inclusive dates)

Animal	A	B	Animal	A	B	Animal	A	B
~~Antbear~~		~~1~~	~~Francolin~~		~~700~~	~~Klipspringer~~		~~1~~
~~Baboon~~		~~20~~	~~Geese~~		~~300~~	~~Kudu (m)~~		~~15~~
~~Buffalo (m)~~		~~15~~	~~Genet cat~~		~~5~~	~~Leopard (m)~~		~~1~~
~~Bushbuck (m)~~		~~10~~	~~Giraffe (m)~~		~~7~~	~~Lion (m)~~		~~1~~
~~Bushpig~~		~~40~~	~~Grysbok (m)~~		~~2~~	~~Mongoose~~		~~2~~
~~Caracal~~		~~2~~	~~Guinea fowl~~	~~1000~~		~~Nyala (m)~~		~~2~~
~~Civet cat~~		~~6~~	~~Hippopotamus~~		~~1~~	~~Pigeons/ Doves~~		~~2000~~
~~Duiker (m)~~		~~8~~	~~Honey Badger~~		~~2~~	~~Porcupine~~		~~3~~
~~Eland (m)~~		~~8~~	~~S. Hyena~~		~~2~~	~~Sable (m)~~		~~1~~
Elephant (m)		2	~~Impala (m)~~		~~100~~	~~Serval~~		~~5~~
~~Elephant T/L~~		~~2~~	~~Jackal S/S~~		~~10~~	~~Warthog (m)~~		~~30~~
~~Waterbuck (m)~~		~~5~~	~~Wildcat~~		~~5~~	~~Wildebeest (m)~~		~~25~~
~~Zebra~~		~~25~~	xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx					

Secondly to remove from the Hunting Area such number of animals as indicated in column "B" above against the name of the animal specified. An animal specified may be removed in whole or in part unless there is a condition on this permit prohibiting such removal.

Thirdly to sell, within a period of six months from the second date which appears above, the trophies of such number of animals as may be indicated in column "B" above against the name of the animal and subject to any other regulations which may be in force governing movement, sale or export of wildlife trophies.

The holder of this permit shall not permit any other person to hunt the animals specified in addition to such holder and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issue the permit

Parks and Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
02 JAN 2018
HEAD OFFICE
P. O. BOX CY 140 CAUSEWAY HARARE
TEL (04) 707 624

for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(Designation AREA MANAGER *)*

for Finance Manager

for and on behalf of the Director General, *Parks and Wildlife Management Authority*

(Designation ADCS *)*

Printed by Printflow (Private) Limited

Mt. McKinley Bank

MAIN OFFICE
500 - 4th Avenue (907) 452-1751
Fairbanks, Alaska 99701
2 7

CASHIER'S CHECK

89-7126
3252

[redacted]

VOID AFTER SIX (6) MONTHS

Details on back. Security Features Included

PAY **$100 DOLLARS AND 00 CENTS**

DATE	AMOUNT
Aug. 04, 2018	**$100.00

If over $10,000.00 two signatures required

TO THE ORDER OF US FISH AND WILDLIFE SERVICE

Patty Monzold

AUTHORIZED SIGNATURE

RE: MARK A WADE

[redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 15 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LILLIS	CHRISTOPHER	MICHAEL	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MIDLAND	TEXAS	(b) (6)		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 the **nonrefundable application processing** fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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)

Christopher M Lillis 08/08/2018

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 a trophy 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 4-6 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.

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

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Genus Pardus (common name) African Lion

   b. Sex (if known).
   Male (females not allowed to be harvested in Tanzania)

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:
   Tanzania Mkie North Game Control Area
   Region - Katavi Hunting Block Mkie North Control Game Area
   Nearest City Tabora

   b. Date wildlife is to be hunted:
   To be determined as will be on Safari for the duration of 28 days. Dates from Sept. 2 - 29th 2018.

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Wild Footprints Limited
   Raoul Ramoni
   Johnny Vakas

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, 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 was removed from the wild:

   b. Date wildlife was hunted:

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

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 foreign export/re-export document]:

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).

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:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

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, local community, or government?

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

The affiliate companies along with Tanzania Big Game Safaris are all under one-management agreement with Tanzania Big Game Safaris. Tanzania Big Game Safaris has been operating in Tanzania since 1988. Since its inception, the founder and managing director is Raoul Ramoni. Raoul has always been extremely active in wild life conservation. He has always been a true custodian of the land and wildlife. In addition, he has a very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employes over five active anti-poaching teams with over 50 anti poaching officers that are protecting a single area. They protect this particular area from illegal poachers, woodcutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserve. Due to the very stringent wildlife management program these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been able to properly manage the areas. Thus, this dramatically limits the harvesting of male lion to only an older more mature male type lion.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 08/08/2018

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 governments 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 shipments 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).

(b) (6)

(b) (6)

August 8, 2018
Date

Pay to the Order of U.S. Fish and Wildlife Service $ 100.00/xx

one hundred dollars and no/100 Dollars

Frost
www.frostbank.com

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 15 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Isbell	James	Hunter	

(b) (6) [redacted]

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

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Midland	Texas	(b) (6) [redacted]		USA

2.a. Mailing address (include if different than physical address; include name c [redacted]

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

08/08/2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

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.

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

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera LEO Genus Pardus (Common name) African lion

b. Sex (if known).
Male (Females not allowed to be harvested in Tanzania

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:
Tanzania Mlele North Game Control Area Region - Katavi hunting Block Mlele North contro Game Area. Nearest City Tabora

b. Date wildlife is to be hunted:
To be determined as will be on Safari for the duration of 28 days. Dates from Sept 2 - 29 Sept 201

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
Wild Footprints limited
Raoul Ramoni
Johnny Yakas

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, 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 was removed from the wild:

b. Date wildlife was hunted:

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

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]:

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).

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:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

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?

   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?

   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 The affiliate companies along with Tanzania Big Game Safaris are all under one management agreement with Tanzania Big Game Safaris. Tanzania Big Game Safaris has been operating in Tanzania since 1989. Since its inception, the founder and managing director is Raoul Bandinelli has always been extremely active in Wildlife Conservation. He has always been a true custodian of the land and wildlife. In addition he has very strong and active anti-poaching team working throughout the year in each of the concession areas. In some cases, depending on the size of the area he is managing, he employs over five active anti-poaching teams with over 50 anti poaching officers that are protecting as wide area. They protect this particular area from illegal poachers, wood cutters, illegal miners, illegal fishermen, illegal honey gatherers and illegal cattle herders (bringing cattle to graze) inside the Game Reserve. Due to the very stringent wildlife program, these areas under his management have a very healthy and sustainable game population. Amongst the game found in these areas, there are an abundance of lions and leopards. The numbers of predators have increased dramatically due to very stringent policies that have been in place for as long as Raoul has been able to properly manage the area. Thus, this dramatically limits the harvesting of male lions to only an older more mature male typically over the age of eight years and that is as lower

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: _____

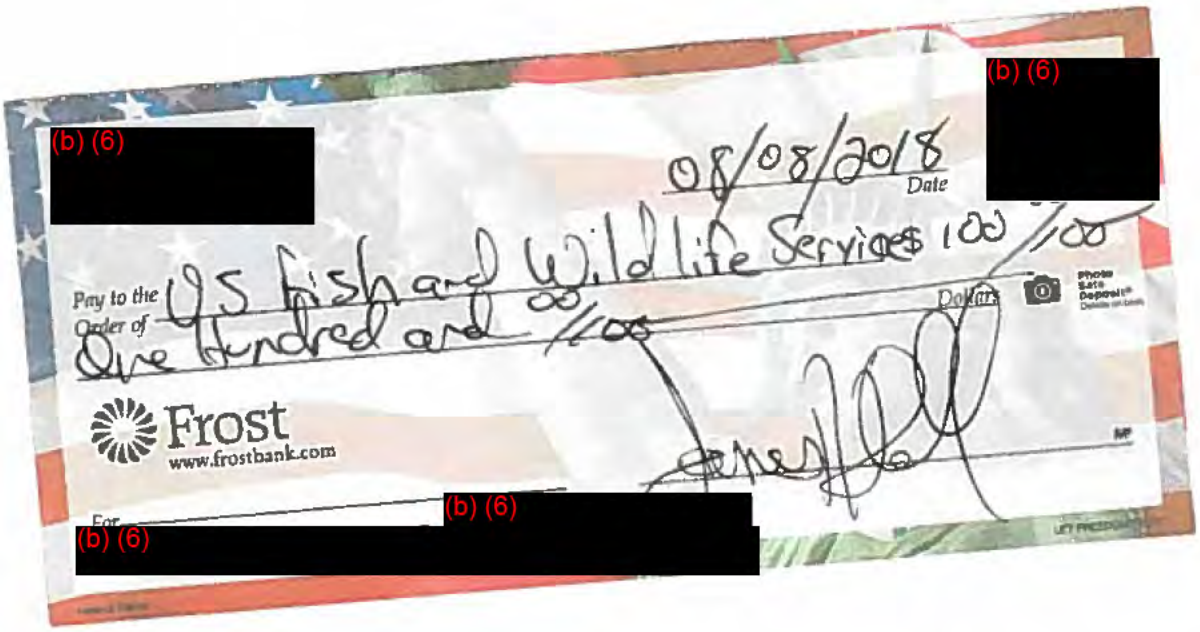
11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

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: _____ Date: 08/08/2018

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).


(b) (6)
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08/08/2018
Date
Pay to the Order of
US fish and Wildlife Service
$ 100/00
Dollars
Photo Safe Deposit®
Frost
www.frostbank.com
For
(b) (6)
(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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August 21, 2018

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

RCVD AUG 23 2018

RE: RE: Import application for Tanzania Lion Trophy, Todd Cusick

Dear Chief Cogliano:

Enclosed please find the application to import a lion trophy that will be hunted between July and October of 2019 in the Rungwa Mpera Hunting Block of Tanzania. The applicant, Todd Cusick, will be hunting with Michael Angelides of Old Nyika Safaris Ltd. Please refer to the hundreds of pages of enhancement information Conservation Force has previously submitted to DMA including the Operator Enhancement Reports for Old Nyika Safaris for the years 2016 and 2018 (copies also attached here), as well as information submitted by Tanzania authorities, outfitters, and others, in making an enhancement finding for lion trophy imports from Tanzania.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Cusick import permit application and Notice of Representation
- Old Nyika Safari's 2016 Operator Enhancement Report
- Old Nyika Safari's 2018 Operator Enhancement Report
- Map of Rungwa Mpera G.R. Hunting Block GPS Coordinates 2013-2018

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 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 the attorney, 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: Todd Cusick

Date: 8-1-18

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CUSICK	TODD	DENNIS	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

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 #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
PROVO	UTAH	(b) (6) [redacted]		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

08/01/2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

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.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO

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:

LUKWATI NORTH GAME RESERVE (1,748 square kms), CONCESSION IS IN CHUNYA DISTRICT, NEAREST CITY IS MBEYA. CHUNYA MSAMI, CHUNYA LUKWATI & PITI WEST (6,603 square kms) CONCESSIONS ARE IN CHUNYA DISTRICT. NEAREST CITY IS MBEYA. ALL LOCATED IN SOUTH WEST TANZANIA AND BORDER THE PITI AND THE RUNGWA RIVER.

b. Date wildlife is to be hunted:

BETWEEN JULY & OCTOBER 2019. SAFARI DATE TO BE FINALIZED.

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

OLD NYIKA SAFARIS LTD.
MICHAEL ANGELIDES

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:

b. Date wildlife was hunted:

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

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]:

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). HUNT TO TAKE PLACE IN 2019 AND PERMITS AND WILL BE PROVIDED ONCE OBTAINED AND THE HUNT IS COMPLETED.
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:	OLD NYIKA SAFARIS LTD
Business Name:	OLD NYIKA SAFARIS LTD.
Address:	P. O. BOX 4
City:	ARUSHA
State/Province:	NOT APPLICABLE
Country, Postal Code:	TANZANIA

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?

COMPANY AND AREA INFORMATION HAS BEEN PROVIDED THROUGH CONSERVATION FORCE AS PER ATTACHED DOCUMENTS, MAPS AND DATA.

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?

ESTIMATED LICENSE AND GOVERNMENT FEES TO BE PAID TO THE TANZANIAN GOVERNMENT - $6700. TROPHY FEE FOR THE LION THAT WILL BE PAID IF TAKEN - APPROXIMATELY $12,000. THE GOVERNMENT USES TROPHY FEES TO FUND GAME SCOUTS. THE OPERATOR APPLIES FUNDS TOWARDS COMMUNITY SUPPORT AND FUNDING OF ANTIPOACHING PATROLS BY PROVIDING A VEHICLE, FUEL FOOD RATIONS AND SUPPORTING PERSONELL.

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

DONATION OF TENTS TO ANTIPOACHING PATROLS, CONTRIBUTION TOWARDS GAME SCOUT ALLOWANCES PARTAKING IN ANTI POACHING PATROLS, DONATION OF IRON ROOFING SHEETS TO THE LOCAL COMMUNITY FOR THE BUILDING OF A SCHOOL, DEMARKATING BOUNDARIES AND BUILDING BEACONS TO CLEARLY MARK THE RESERVE BOUNDARIES AND DISCOURAGE HUMAN ENCROACHMENT.

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.

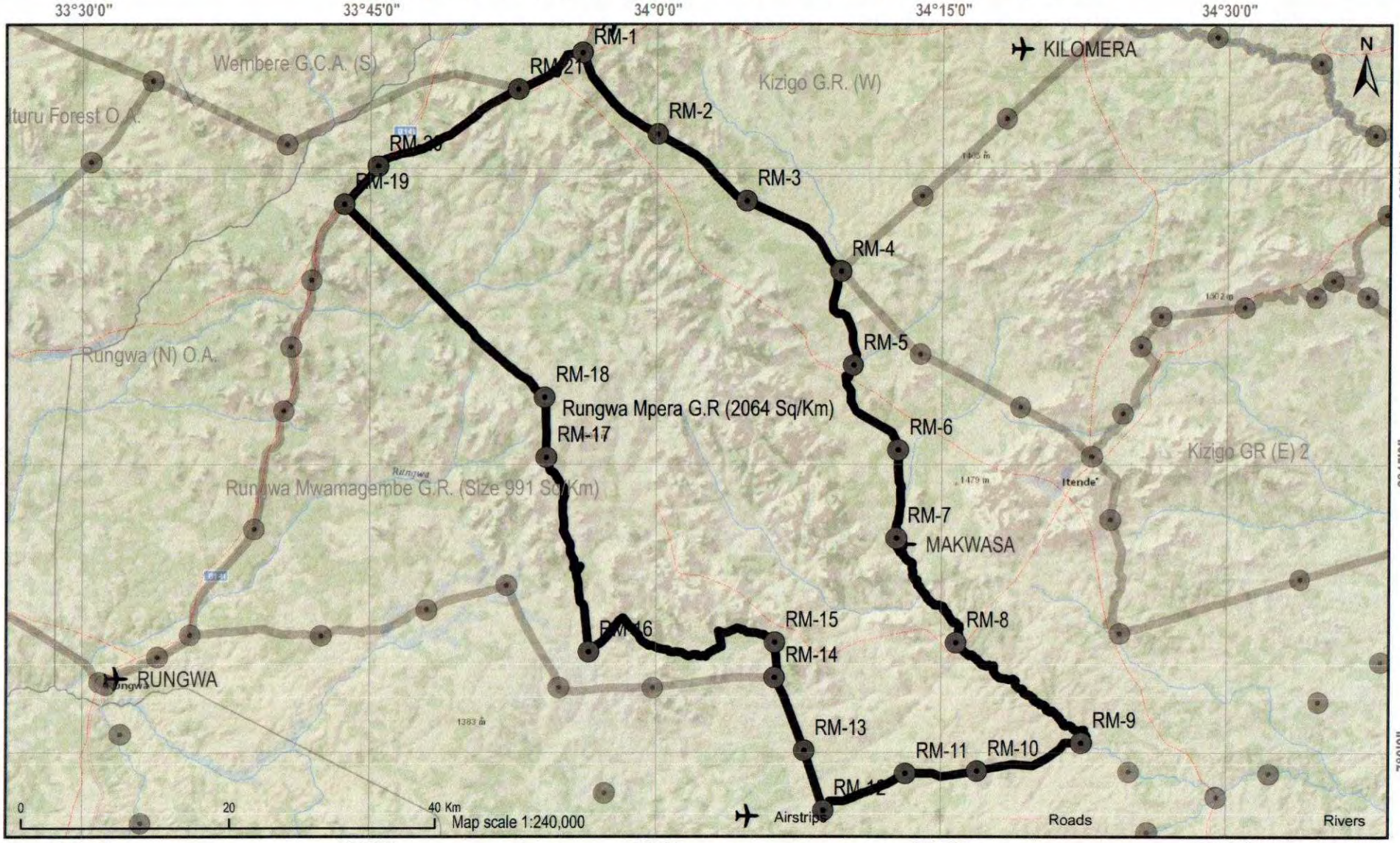
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import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

Applicant's signature: _____ Date: 08-01-18

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).

RUNGWA MPERA G.R HUNTING BLOCK GPS COORDINATES: 2013-2018



GPS ID	RM-1	RM-2	RM-3	RM-4	RM-5	RM-6	RM-7	RM-8	RM-9	RM-10	RM-11	RM-12	RM-13	RM-14	RM-15	RM-16	RM-17	RM-18	RM-19	RM-20	RM-21
Latitude	-6.392	-6.463	-6.521	-6.582	-6.664	-6.737	-6.814	-6.904	-6.991	-7.016	-7.018	-7.05	-6.998	-6.935	-6.904	-6.912	-6.744	-6.692	-6.524	-6.491	-6.424
Longitude	33.935	34.001	34.079	34.162	34.173	34.212	34.211	34.263	34.374	34.282	34.219	34.147	34.13	34.104	34.104	33.941	33.904	33.903	33.727	33.757	33.879

Coordinate System: GCS, Datum: Arc 1960, Units: Degrees

Data source: TAWIRI, 2010

Map production: TAWIRI, 2012

Old Nyika Safaris and Safari Royal

LION HUNTING POLICY 2018

Age is the primary criteria in the selection of all hunting trophies, including lion.

The companies have a zero tolerance policy towards the shooting of young lions.

All Professional Hunters must be able to determine the approximate age of an adult male lion with a reasonable degree of accuracy. Pressure from clients or mistaken ageing are not acceptable excuses should an immature lion be harvested.

Studies of known age lion and standard aging criteria have established sufficient guidelines for field determination of whether a lion is older or younger than the 6 year legal standard.

The following points must be adhered to when hunting lion:

- 6 years of age is the recognized legal minimum for harvestable males
- Male lion must not be accompanied by a pride with cubs or sub-adult young
- Male lion must not be accompanied by a pride with lactating females, should cubs not be visible
- If the lion has a poor mane (i.e. a poor trophy) - then it must show visible signs of advanced age.
- Do not shoot marginal lion in the 5-6 year old category.
- Be careful not to take any obviously young lion even if they have fully developed manes.
- Do shoot - if you are convinced that a lion is 6 yrs + with visible signs of age - One that no one can reasonably question your decision to take it.
- A trophy lion should also pass the criteria that the majority of PH's would agree to it being harvestable.

No client is ever guaranteed to take any trophy – particularly lion.

The success rates for finding 6 year old trophy lion are notoriously low and can never be guaranteed.

The majority of recognized scientists concerned with the study of lion and sustainable lion hunting have endorsed the definition of a huntable lion as follows:

Huntable male lions are defined as those male lions whose off-take has no negative impact on the sustainability of local lion population dynamics. Research has shown that these are typically lions of 6 years of age or more that have completed their first breeding cycle. To reduce risks of infanticide, males of any age known to be heading prides with dependent cubs should not be hunted. Based on these considerations, a huntable male lion is at least six years of age and is not known to head a pride with dependent cubs.

Research models have demonstrated that selective trophy hunting does not alter wild lion population dynamics if restricted to males that meet the criteria of a huntable lion as defined above.

Please insure that you take as many clear photos of the lion as possible. These photos play a crucial role in aging lions, supplying inferior of badly taken photos will go against you in the aging process, make sure you clearly show.

Teeth – from the front, side and show the back of the canines for wear.

Face – front, side clearly show and scars.

Nose – close up and clear.

Mane - Side, front, top, chest.

Full Body – side, top, rear, in particular show any scars

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

Swarovski

1. Name of area operator: __Old Nyika Safaris _____
   a. Years in business: ____20 years_____
   b. Name of company conducting hunt: __Old Nyika Safaris _____
   2. Name of concession: Chunya Msami, Chunya Lukwati, Piti West

      Size in km^2: _6603_____
   a. Land tenure: __ Government lease _√ Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: _____5 years_____ Can it be renewed? _√ Yes __ No
   c. Length of renewal, if applicable: ____5 years_____
   d. Estimated total amount received in trophy fees last year, if applicable: $124,490_____
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: As per wildlife regulations and ACT, companies are required to contribute to anti poaching, block development and contribute a minimum of $5000 cash per concession towards community development. Each company is accessed on its contribution towards these 3
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest City Mbeya, concession is in the district of Chunya, Tanzania (Map attached)
   g. If the concession borders a national park, please provide the park name: NA
   h. Description of general and distinctive habitat features and any water features: Miombo Forest, concession borders the seasonal Rungwa River
3. Are there any communities living in the concession? _√ Yes __ No
   a. If so, estimated number of people or villages in the concession? 12,000_____
4. Are there communities bordering this concession? √ Yes __ No
   a. If so, estimated number of people or villages around the concession? 18,000
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				No study

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Lion				All observations are recorded by GPS, as attached
Leopard				All Observations are recorded by GPS, Pilot monitoring project in progress (2nd year)
Prey species				

6. Total employment number: _____27_____

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	1
Trackers	4-6	2-4
Anti-poaching scouts/rangers	4	2
Other anti-poaching	4	2
Cooks/housekeepers	8	7
Community coordinators	1	0
Managers	1	0
Biologists	0	0
Others: Camp Supervisor	1	0

7. Number of staff employed in the off-season: __13_____

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	3	2	All year
Managers	1	0	All year
Maintenance	1	0	All year
Road opening/construction	3-6	2	May- August
Community relations personnel	1	0	All year
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: __3_____

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? _both___

c. Months during which anti-poaching patrols are conducted: periodic - all year___

d. Number of anti-poaching patrols per month: __14 days at a time____

e. Description of anti-poaching equipment, vehicles, etc.: __1 Toyota land Cruiser pick up

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The company in co-ordination with Tanzania Wildlife Authority does prevention, Tanzania Wildlife Authority are solely responsible for prosecution

g. Do you offer rewards to poaching informants leading to arrest? _√ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? __√ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ___US$_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	$5,979.75	$8,867.95	$11,814.48	
Equipment	$71.25	$133.33	$234.00	
Vehicles	$3582.61	$2,585.47	$2979.78	
Petrol/fuel	$2635.50	$2,155.42	$3,389.53	
Rewards paid	N/A	N/A	N/A	Reward scheme implemented in 2018
Other: Legal fees	$423.75	N/A	N/A	
Other: _____				
TOTALS	$12,692.86	$13,742.17	$18,417.79	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	18	12	15	Camps and tracks
Elephant carcasses observed	2	0	0	
Lion carcasses observed	0	0	0	
Leopard carcasses observed	0	0	0	
Ivory poachers arrested	0	0	0	
Meat poachers arrested	0	0	0	
Other poachers arrested	2	4	6	Trespassers
Poachers convicted	unknown	unknown	unknown	Government information
Snares/gin traps collected	0	0	0	Snares/trap are not used in this region
Firearms confiscated	0	0	0	
Vehicles confiscated	0	0	0	
Bicycles confiscated	2	1	4	
Boats/nets confiscated	0	0	0	
Tusks recovered	0	0	0	

Other: Timber planks	250	5	0	

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? √ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? $5000 cash ($5000 cash per concession yearly required by law) $2000 - $4000 voluntary contribution depending on projects and available funds

c. Does the company provide game meat to nearby communities? __ Yes √ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: ___NA_____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. Government can only conduct this

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _N/A_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant		N/A	N/A	N/A
Lion		N/A	N/A	N/A
Leopard		N/A	N/A	N/A
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	-	-	$324	
Education (e.g., school fees, supplies)	$357	$172.81	-	
Health (e.g., clinics, offices)	-	-	-	
Health (e.g., medical salaries, equipment)	$2100	-	-	
Community scout salaries	N/A	N/A	N/A	No such program
Other community anti-poaching	N/A	N/A	N/A	No such program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Local government activities	$428.25	$75	-	
Water infrastructure improvements	$2142	-	-	
Sports teams funded	-	-	-	
Construction materials donated	-	-	-	$1275
Other: cash donation	$15,000	$15,000	$15,000	
Other: Farming supplys	-	-	$88.99	
TOTALS	$20,027.25	$15,247.81	$15,412	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 0 2016: 0 2017: 0	2015: 1 2016: 0 2017:1	2015:3 2016:1 2017:3	2015: 5 2016: 1 2017:3
Percentage of U.S. clients	2015: 0 2016: 0 2017: 0	2015: 50% 2016:0% 2017:33%	2015:50% 2016:50% 2017:100%	2015:55% 2016:33% 2017:50%
Trophy fees paid by U.S. clients	2015: 0 2016: 0 2017: 0	2015:$18,320 2016:$0 2017:$15,050	2015:$46,890 2016:$16,050 2017:$44,630	2015:$82,060 2016:$16,050 2017:$7,900

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _____$67,580/75%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc. Company lion hunting policy attached, Lion monitoring maps attached, 2017 anti poaching/community development and block enhancement report attached

14. I declare that the foregoing is true and correct.

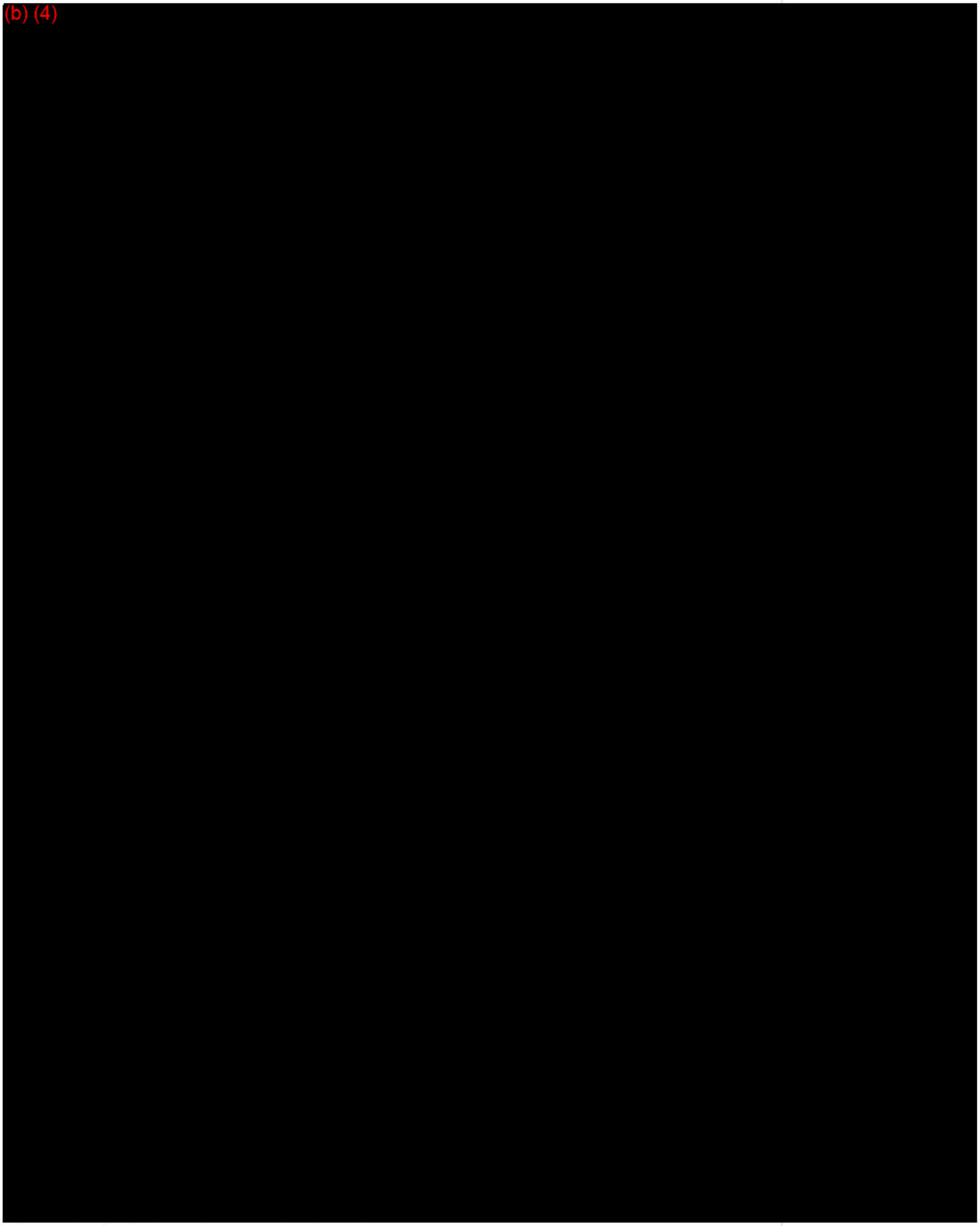
    Signature: _____ Michael Angelides _____

    Name: Michael Angelides____ Title: ___Managing Director_____

PRIVILEGED, PROPRIETARY, CONFIDENTIAL INFORMATION

NOT FOR PUBLIC RELEASE

(b) (4)



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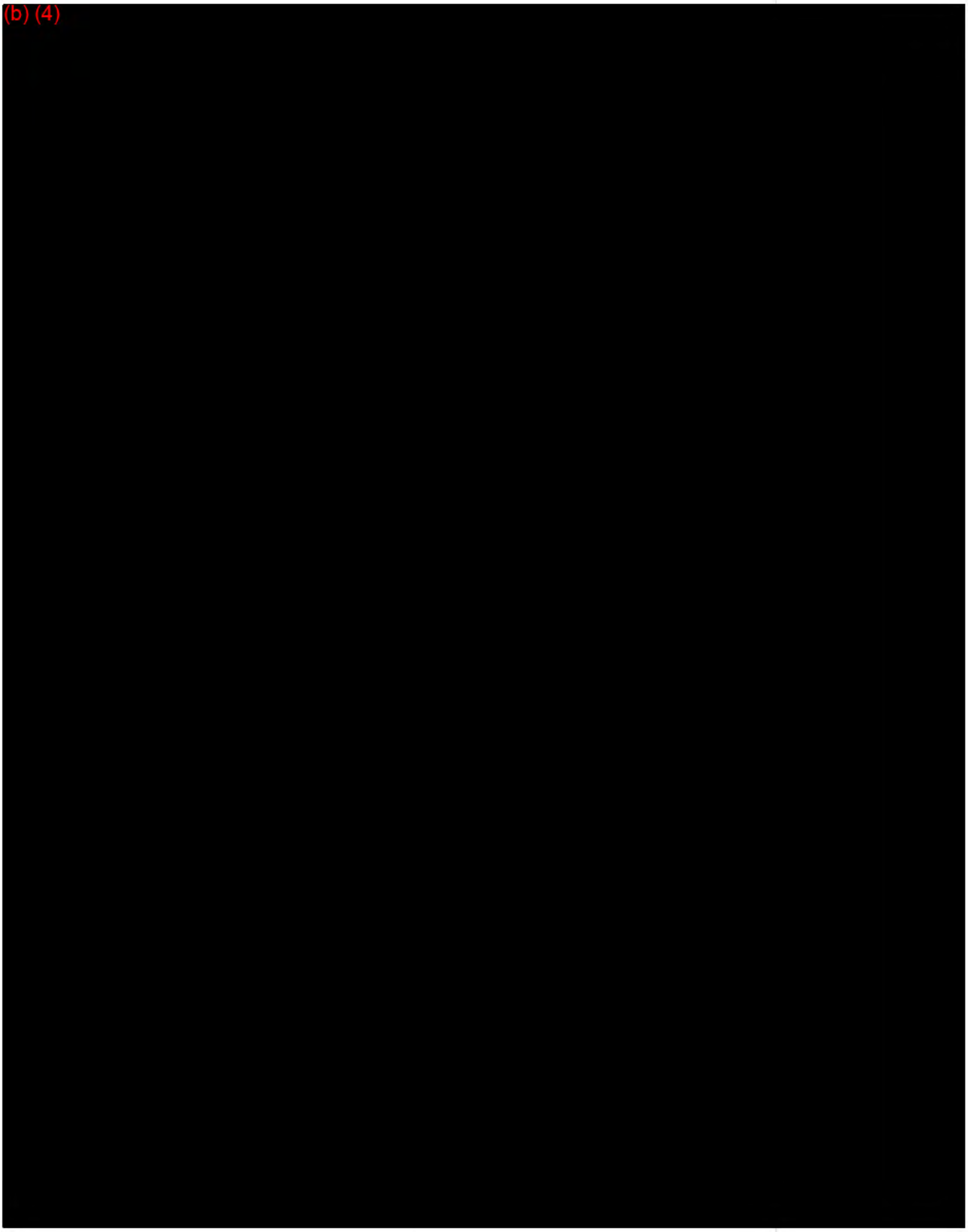

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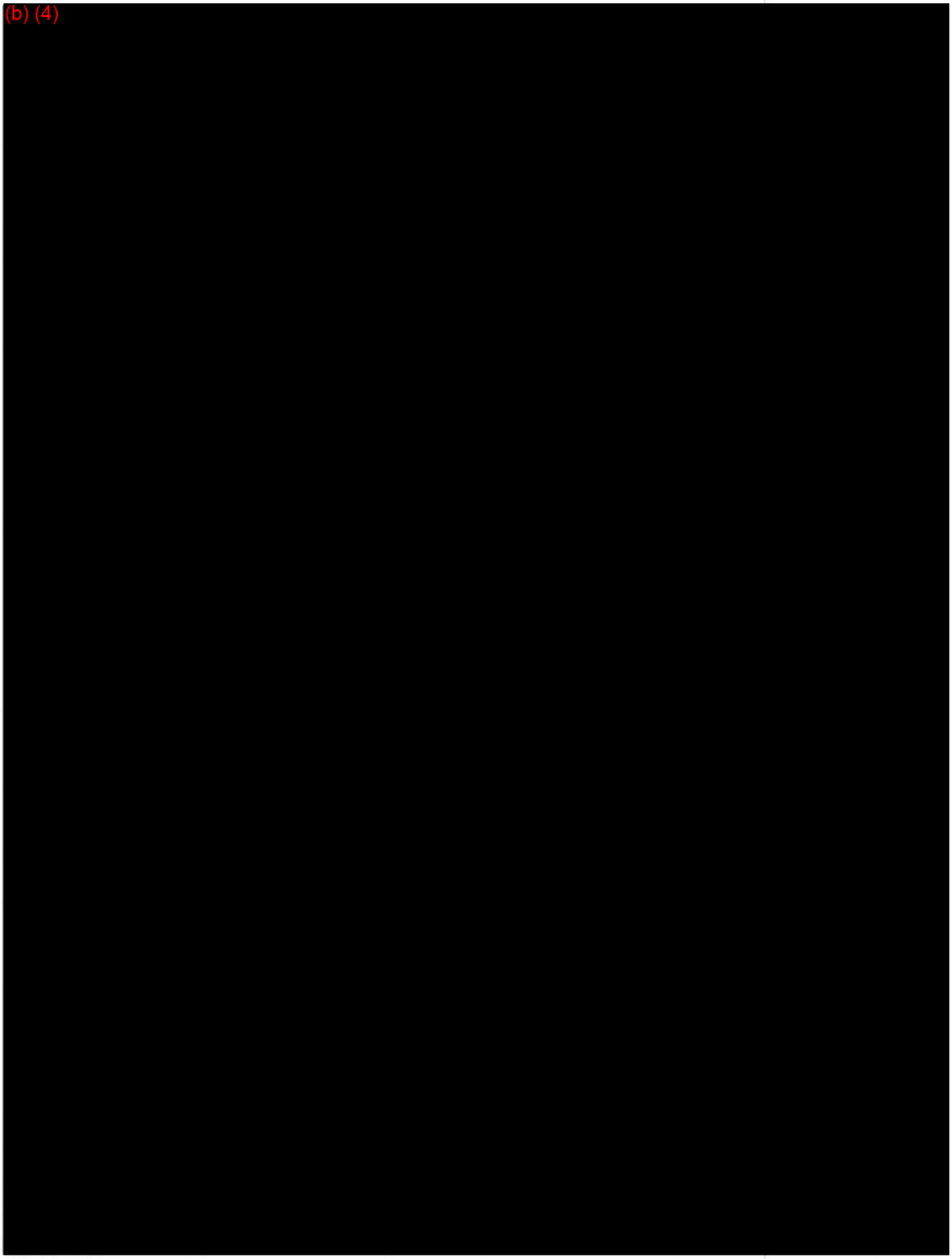

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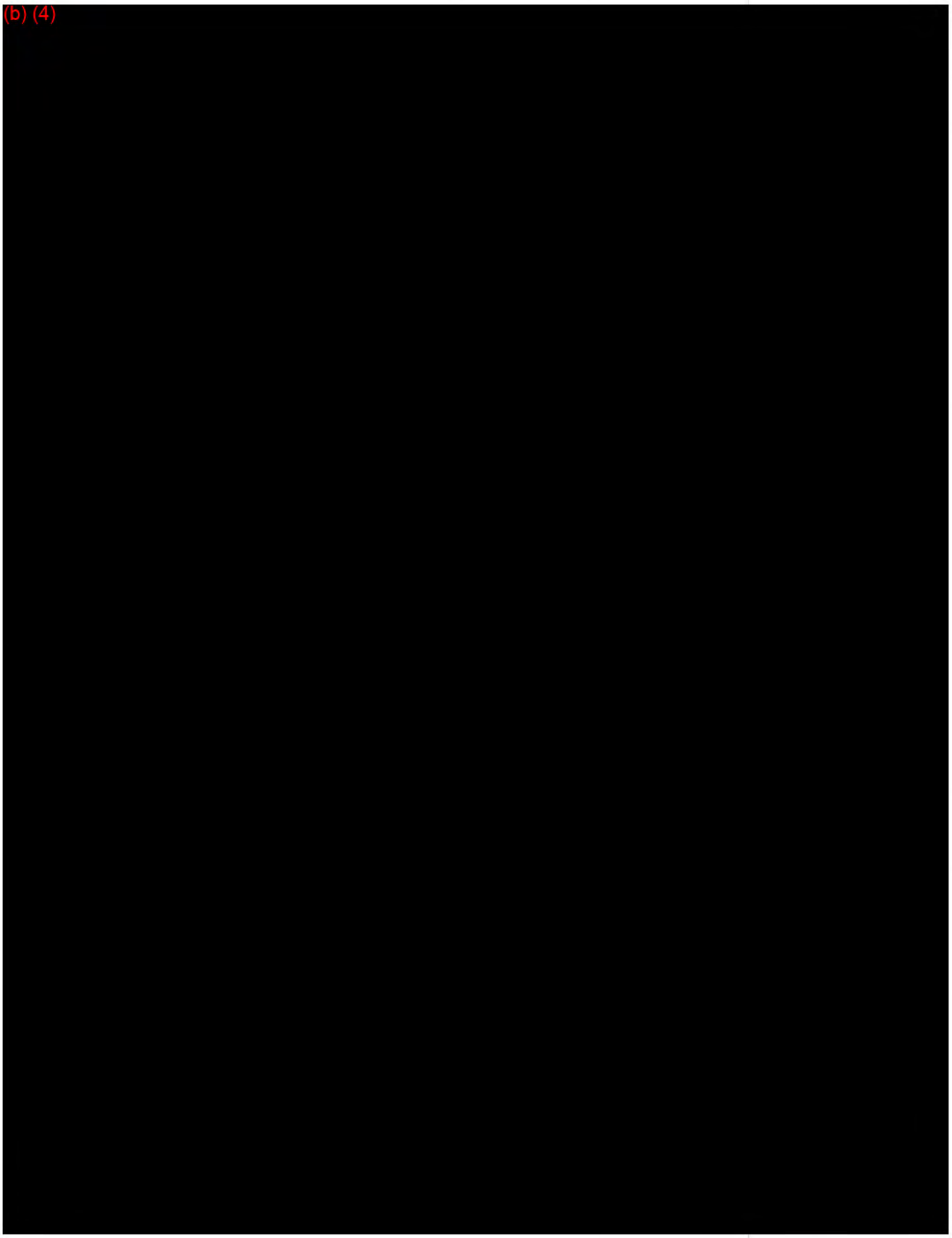

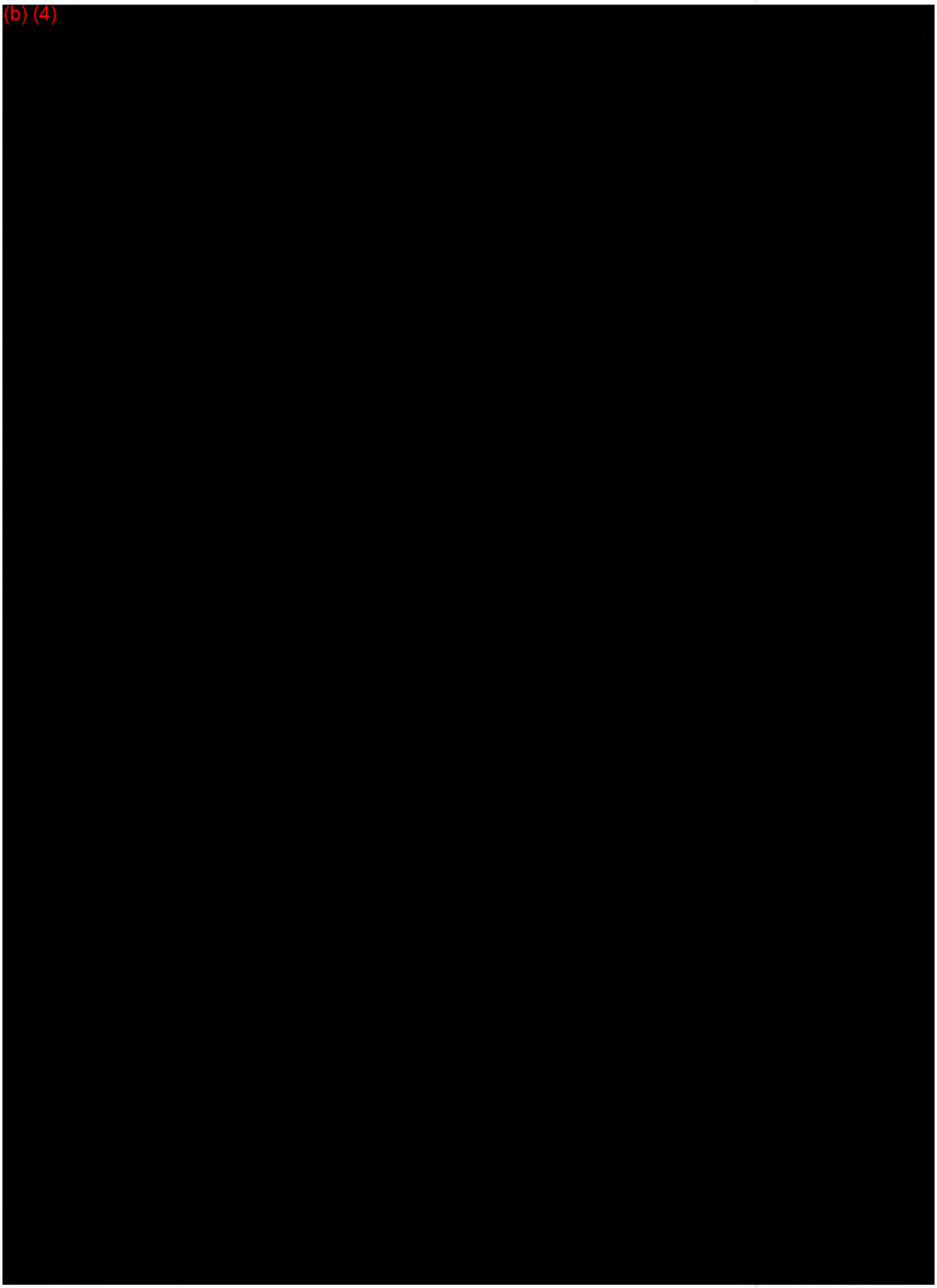
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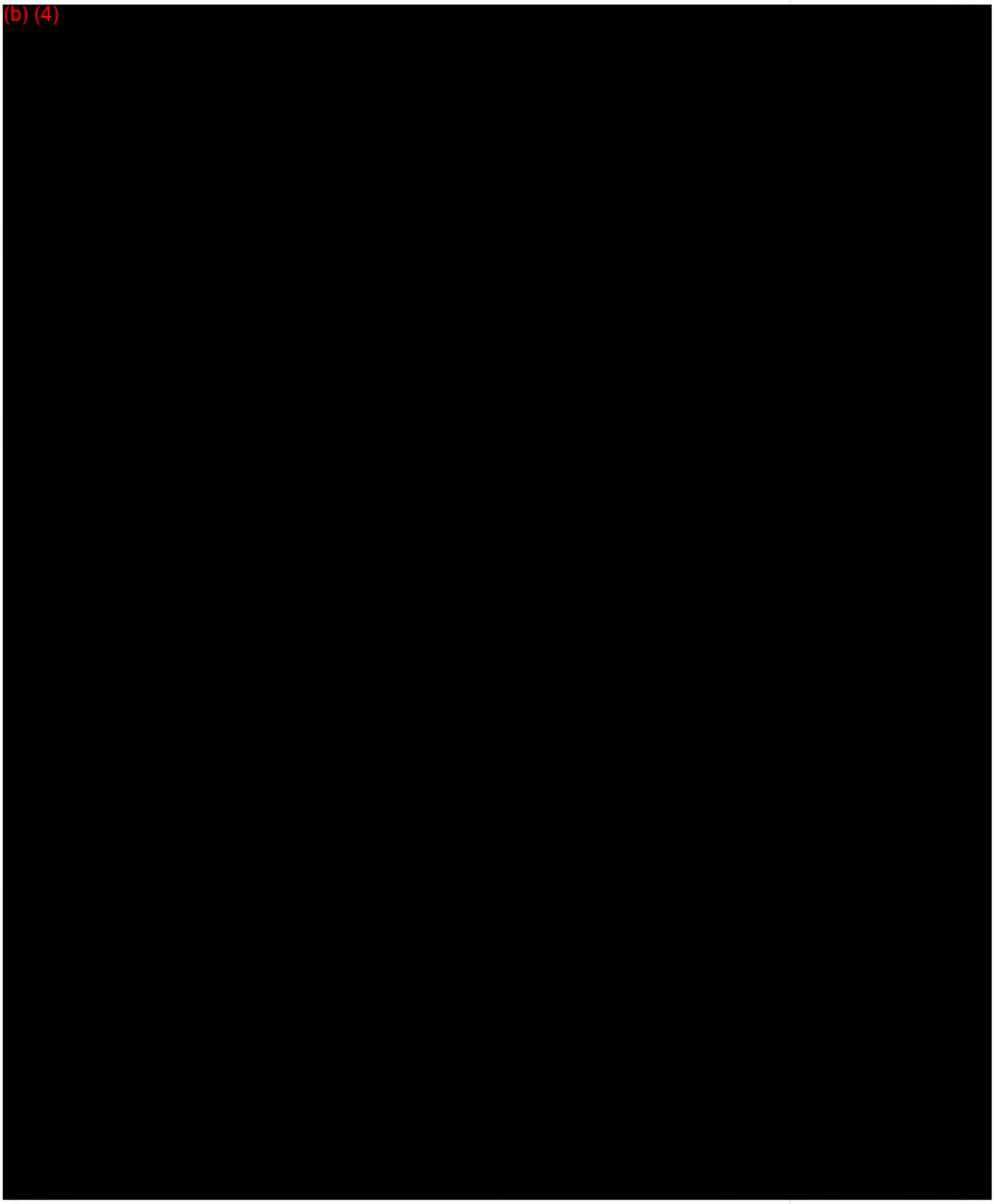

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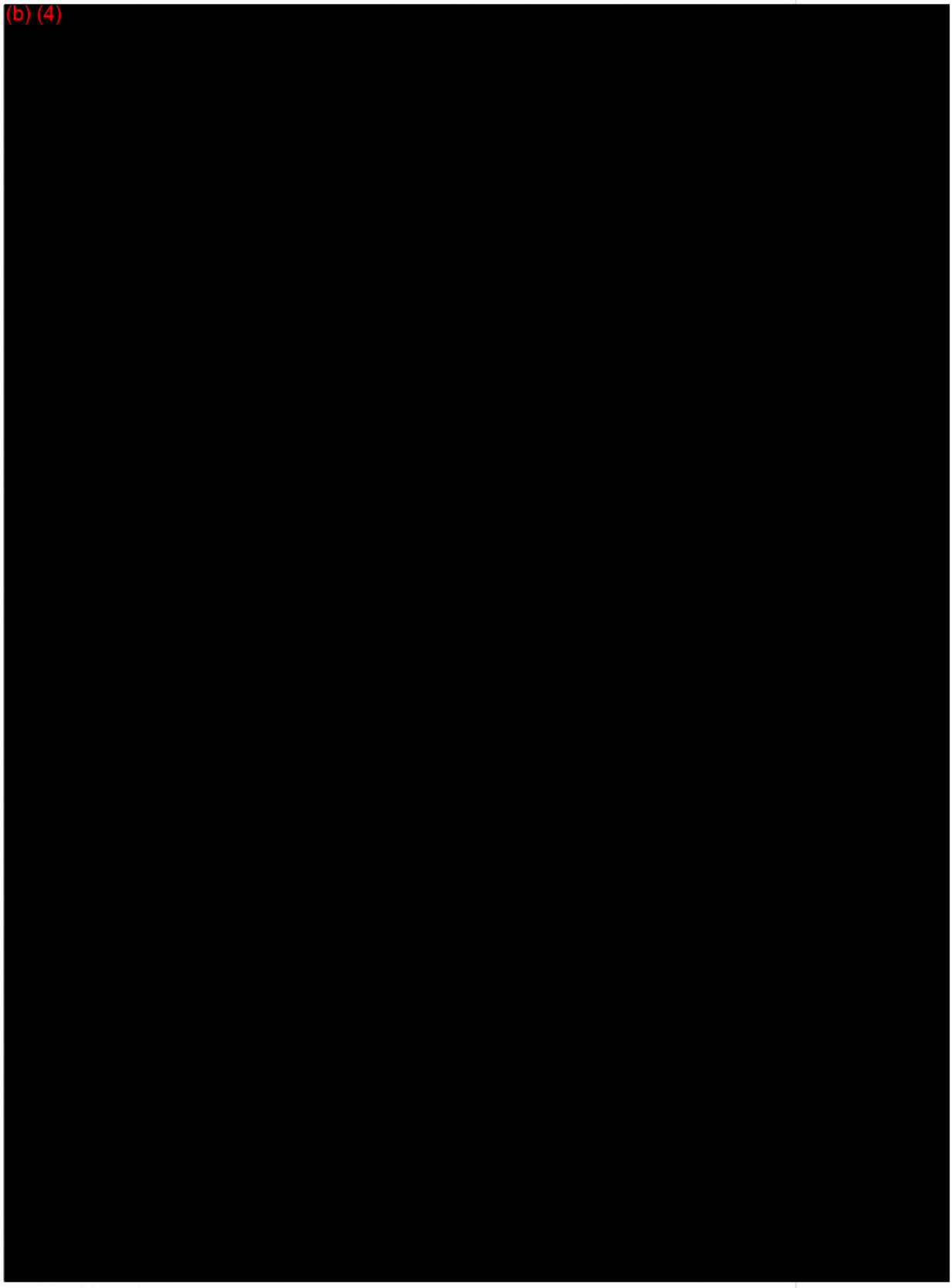

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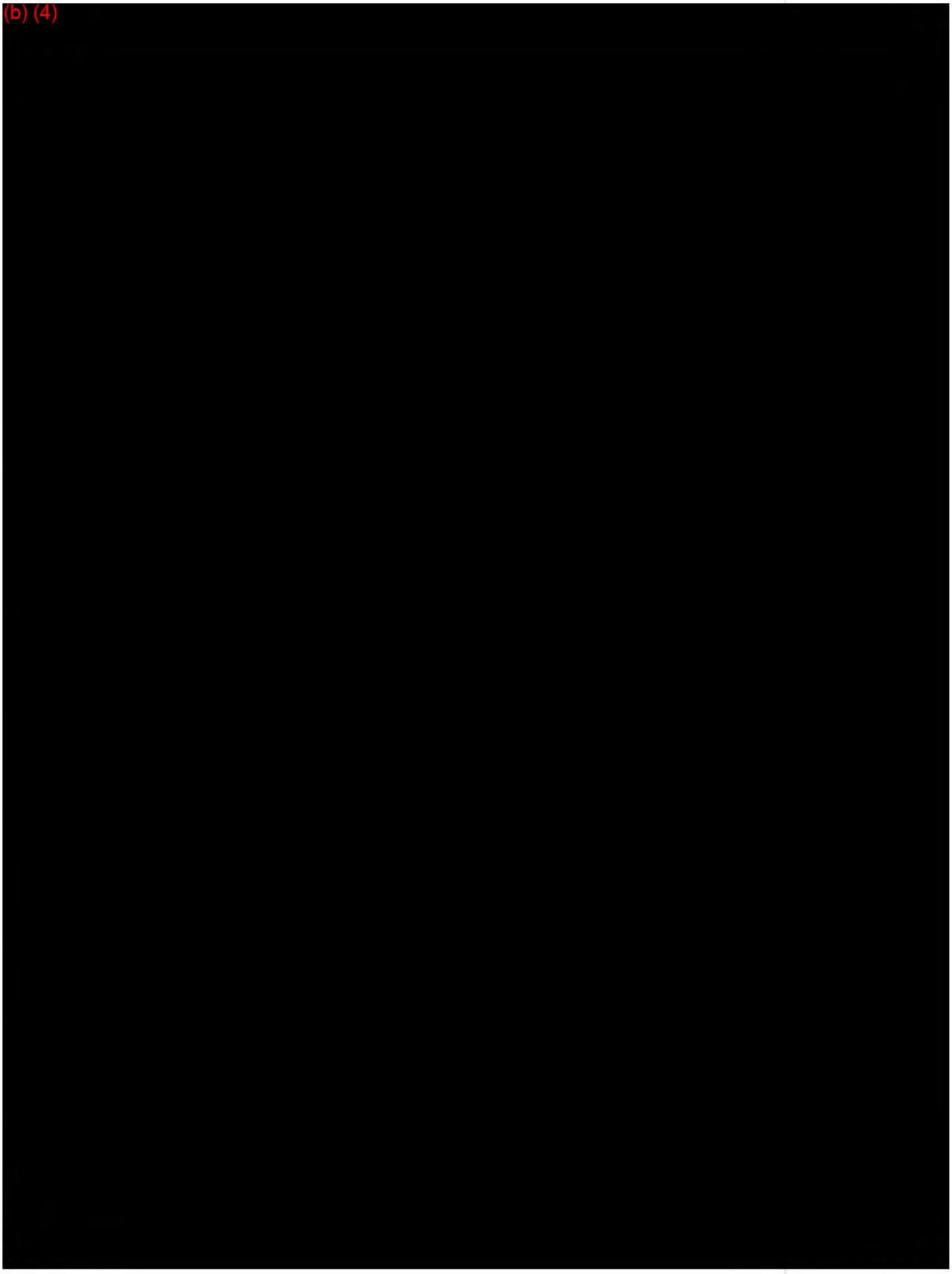

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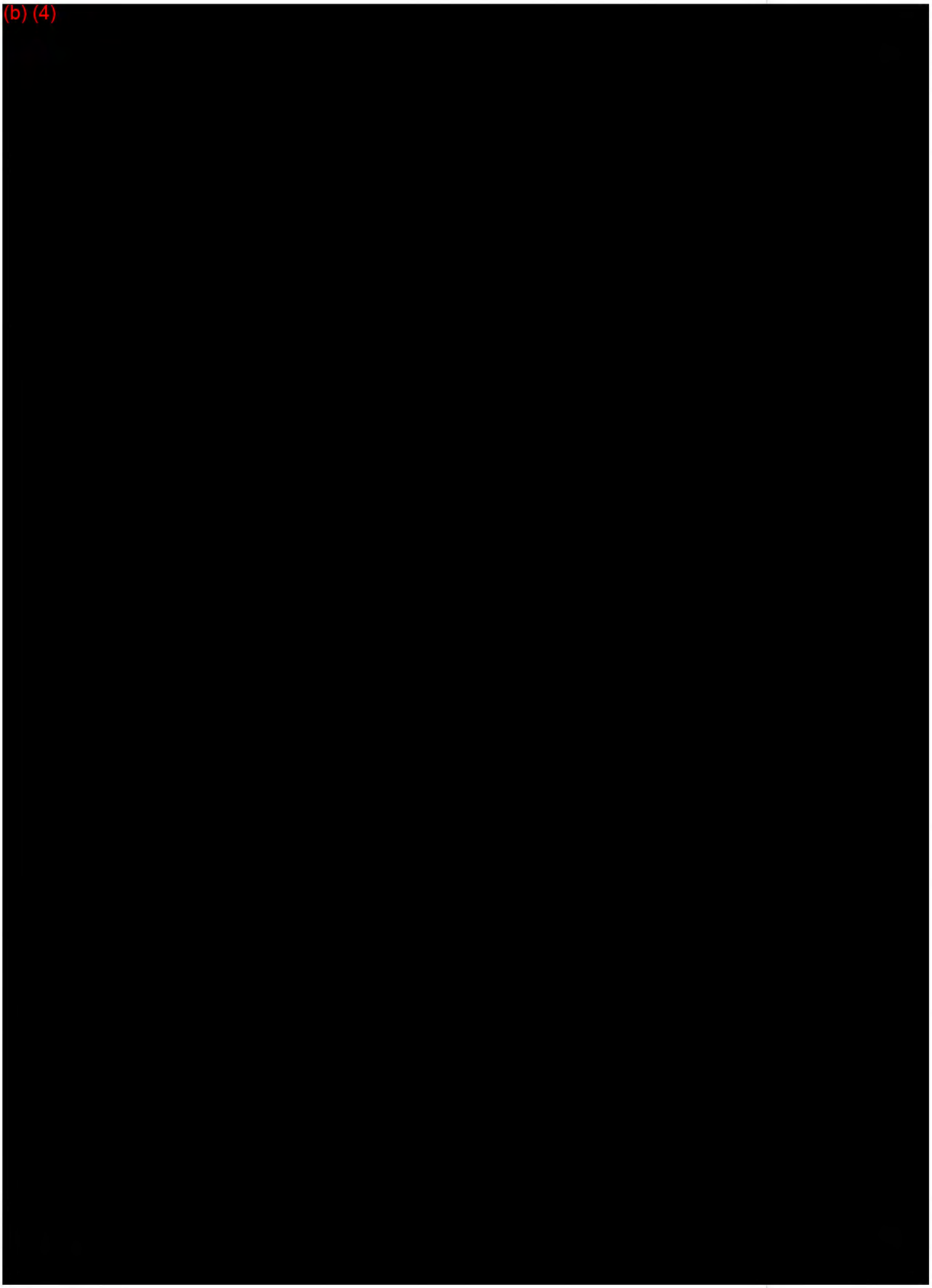

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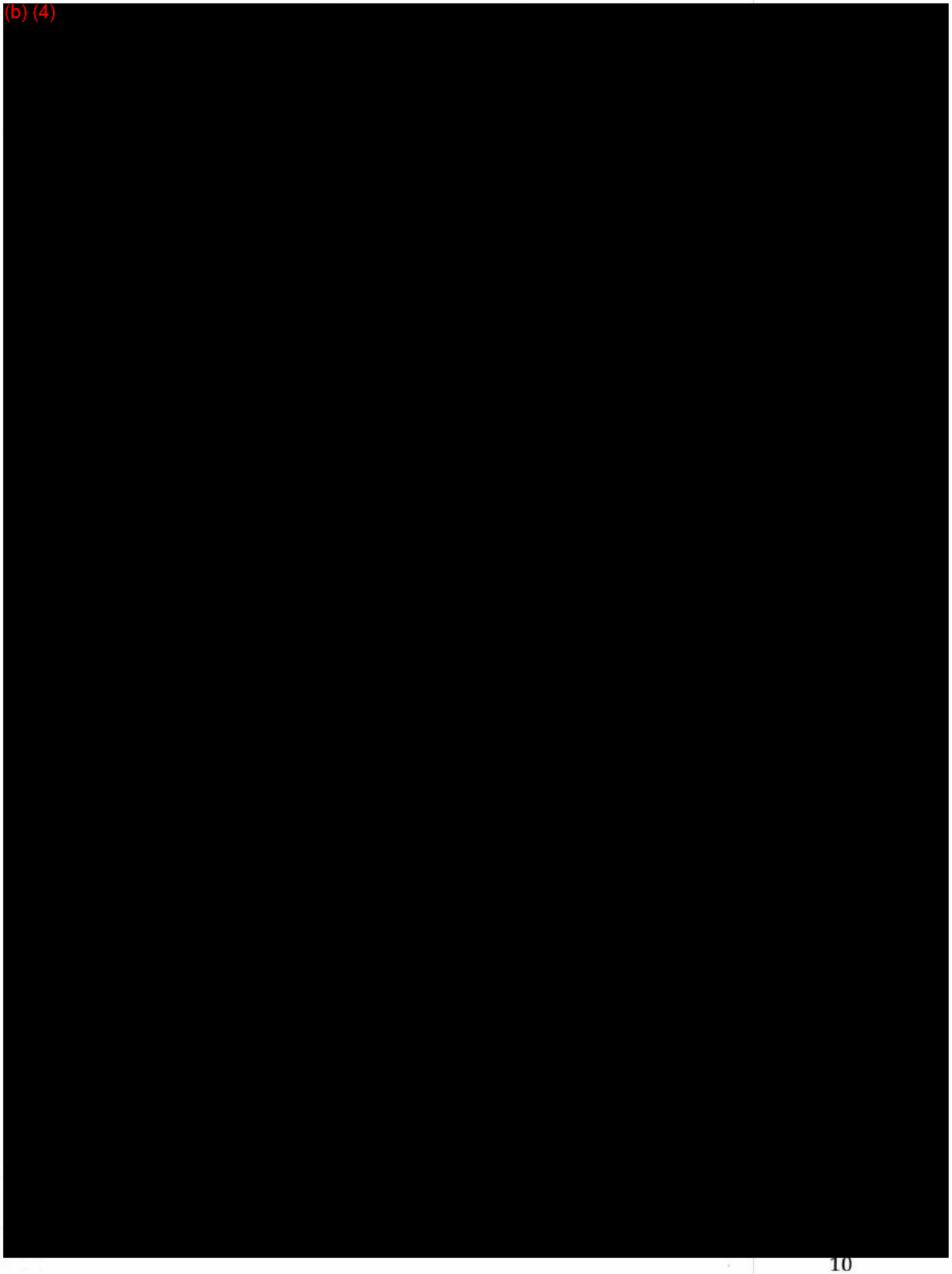

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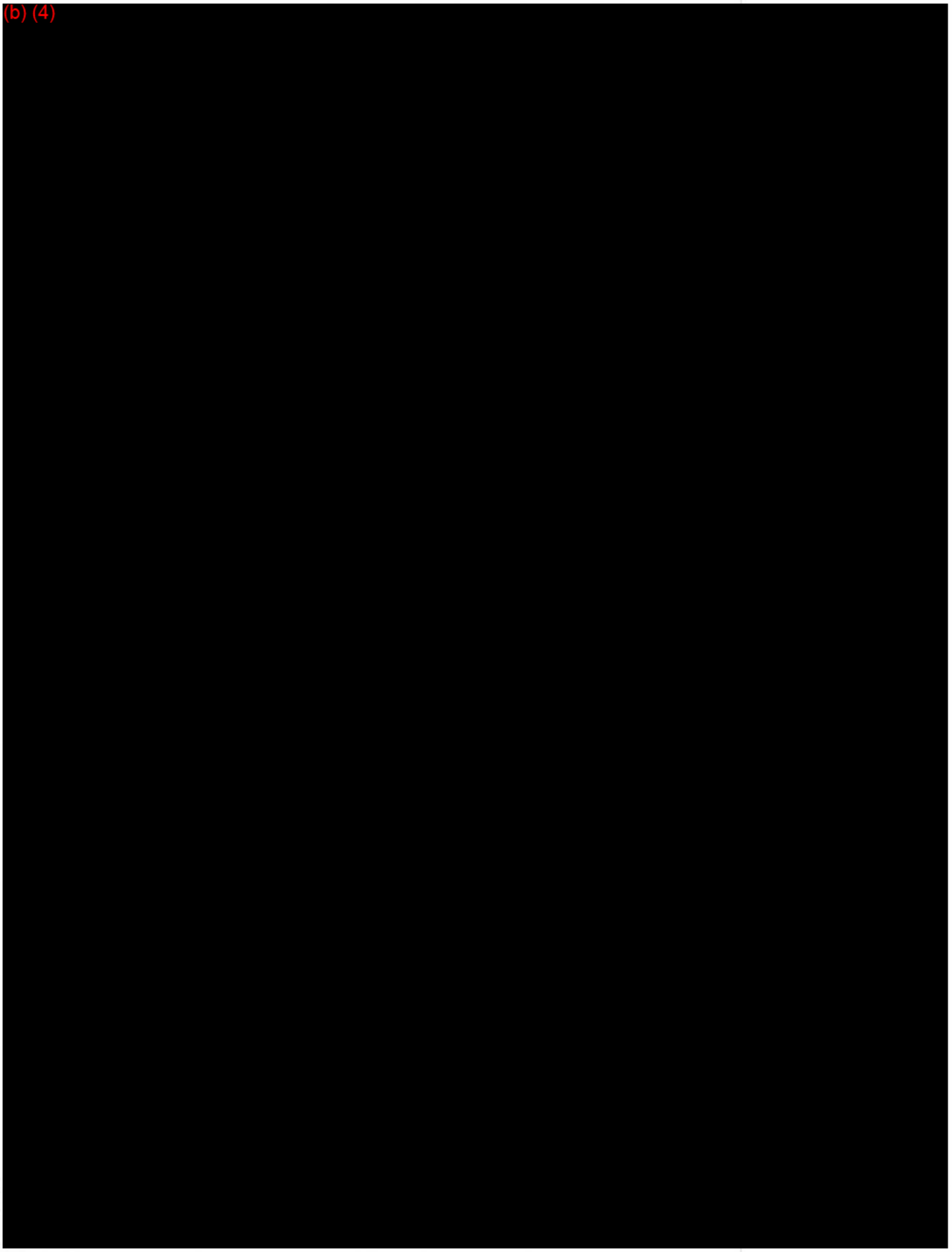

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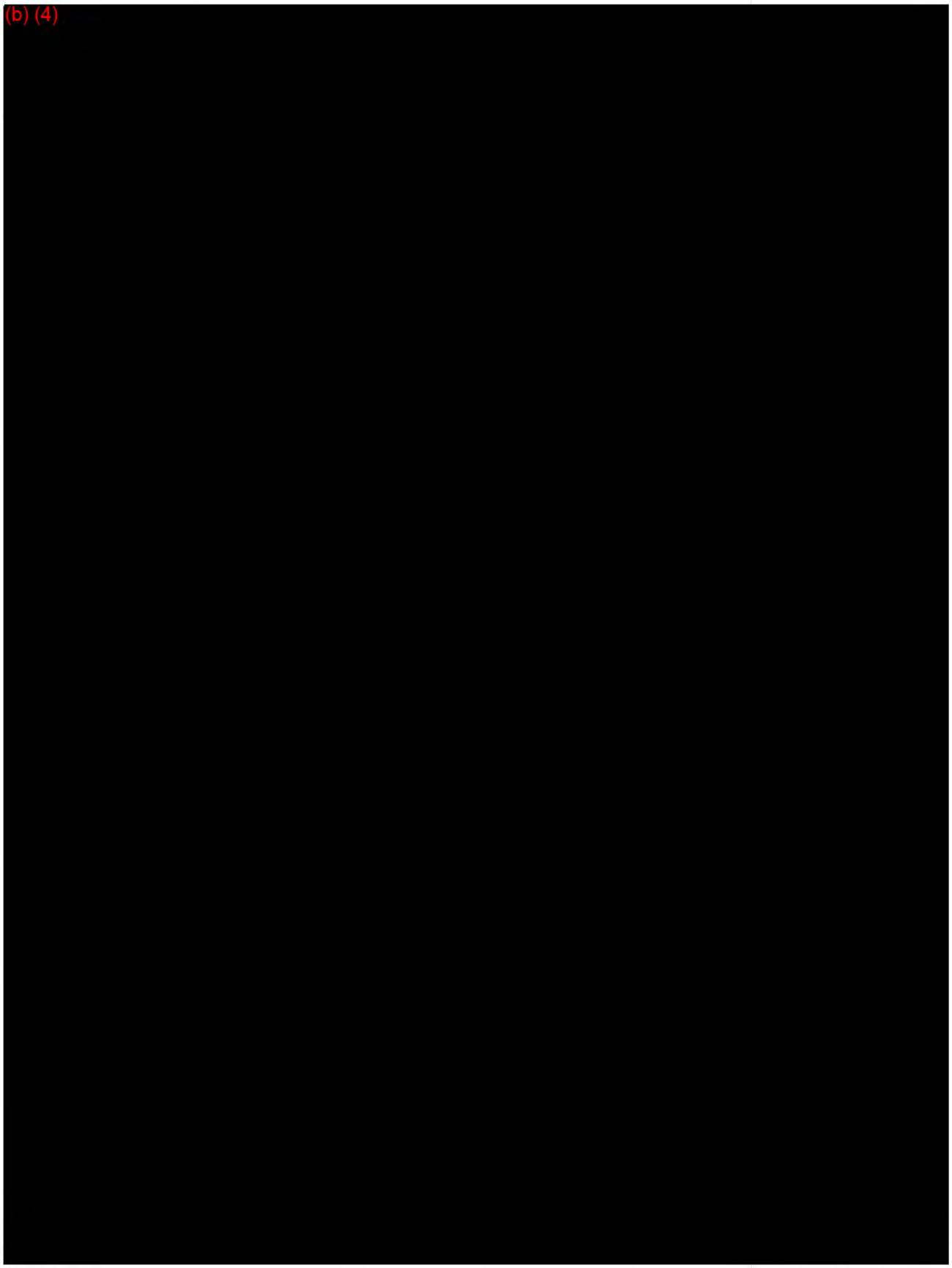

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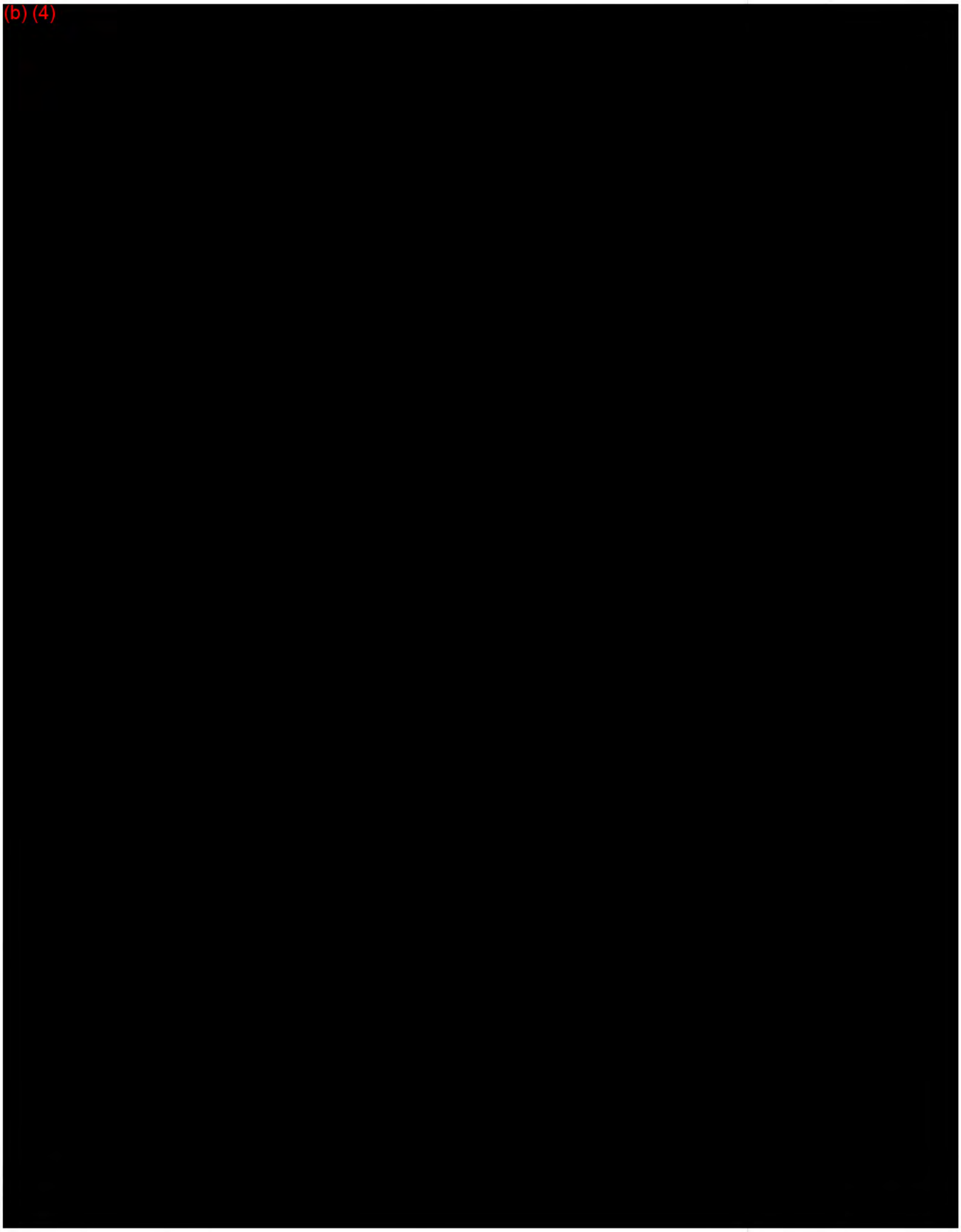

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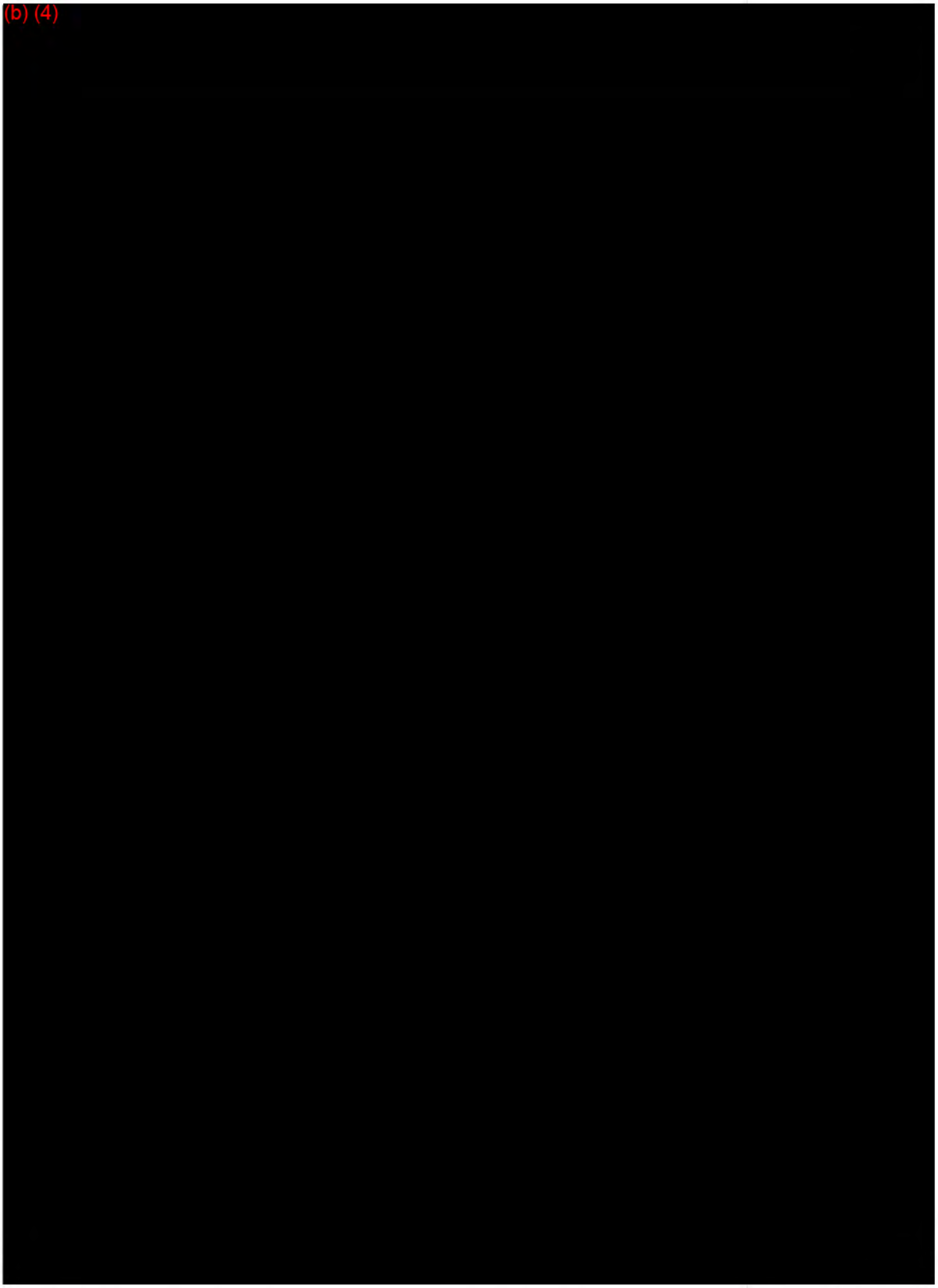

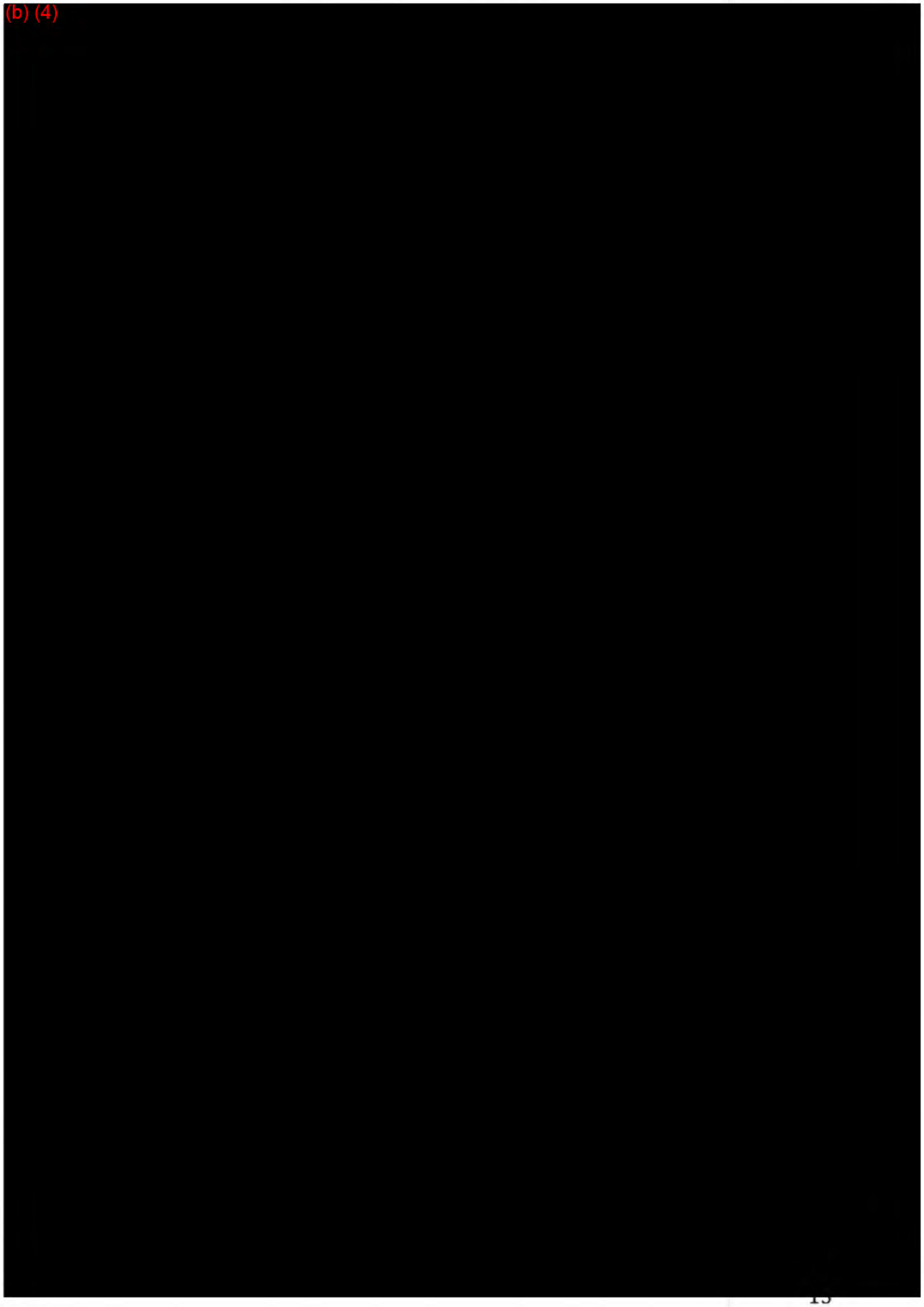
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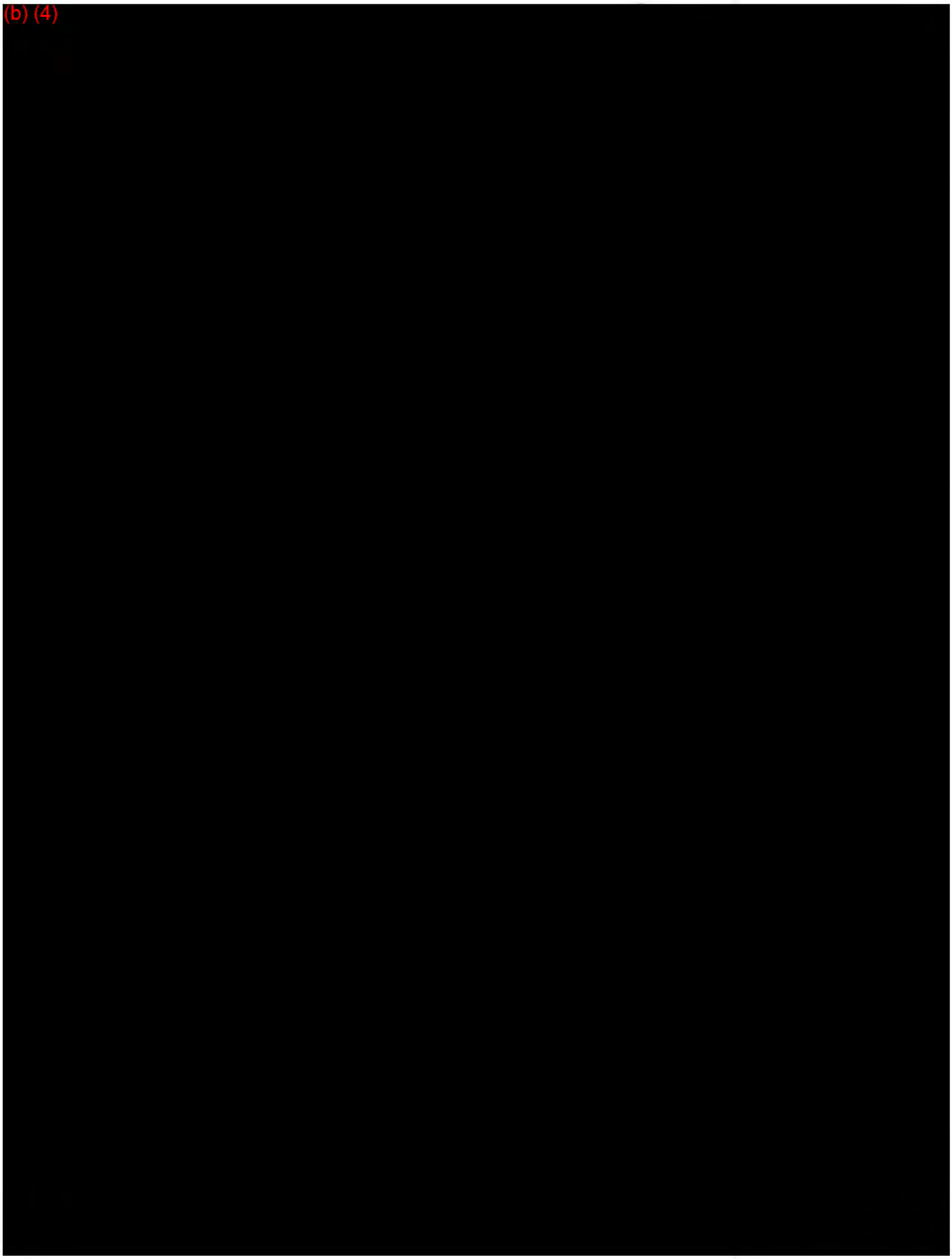

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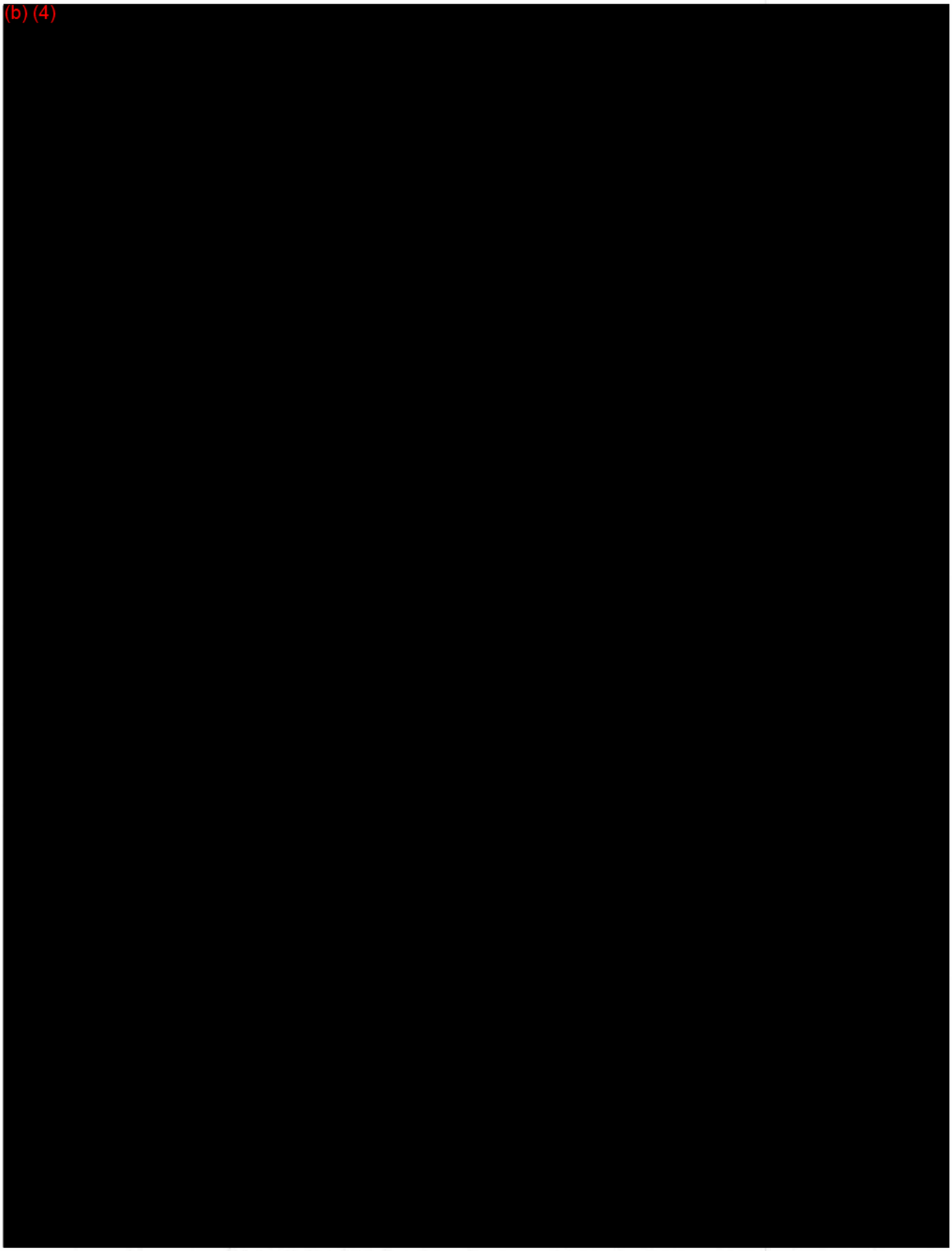

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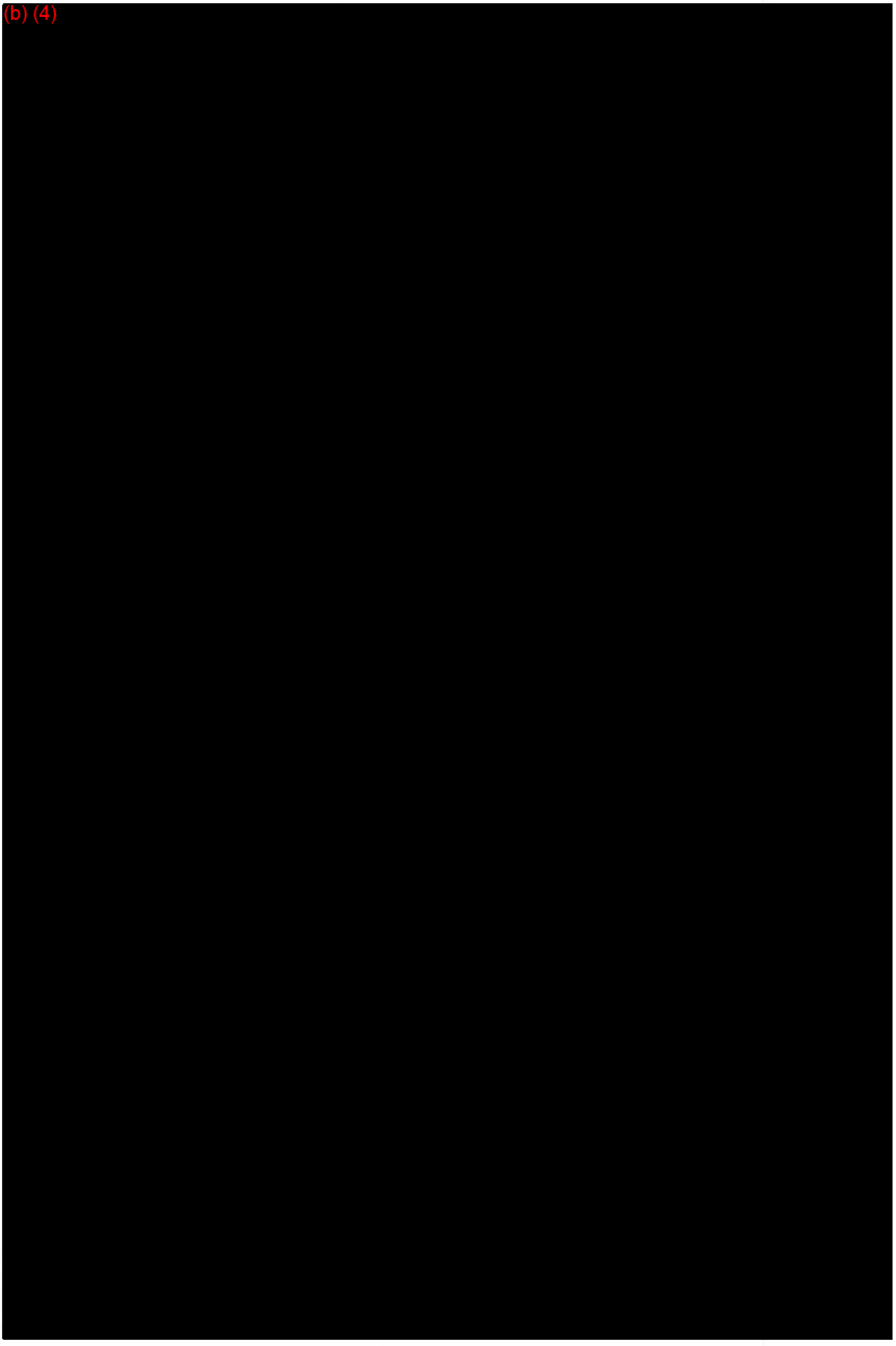

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RCVD AUG 23 2018

THIS CHECK IS VOID WITHOUT A COLORED BACKGROUND AND SECURE DOCUMENT WATERMARK ON THE BACK - HOLD AT ANGLE TO VIEW

(b) (6)

(b) (6)

ZIONS BANK
31-5/1240

DATE 08/01/18

PAY TO THE ORDER OF USFWS

$ **100.00

One Hundred and 00/100********** DOLLARS

USFWS

MEMO Application for Todd Cusick - Lion

(b) (6)

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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August 22, 2018

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

RCVD AUG 23 2018

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Type of Activity WML:ON-RSA

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

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Williams	Jacob	Walton	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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)

Jacob Williams 07/28/2018

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.

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

Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. 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). Female

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:

b. Date wildlife is to be hunted:

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

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:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

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

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

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]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

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).

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:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

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?

SEE ATTACHED

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?

SEE ATTACHED

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

SEE ATTACHED

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: Jacob Williams Date: 9/7/28/2018

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).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

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 LIONESS 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: Jacob Williams

Name: JACOB WILLIAMS

Date: 6/28/18

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 460, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zdkl@vodamail.co.za

12 February 2018

To Whom It May Concern
Veterinary statement

Re: Origen of the Nuutbegin Natuur Reservaat Lions.

I, Gerhardus Scheepers, ID 7404265006087, a veterinarian registration number D99/4295, state that the following information is true and correct as given in the sentences below.

I did the darting and relocation of 4 lions from Tswalo to Nuutbegin in late January 2012. I travelled with them from Tswalo to Nuutbegin and off loaded in the temporary holding boma before being released onto the Reserve

This all happened between 19 and 22 January 2012. We had to stay a day longer at Tswalo before we could dart and load the lions due to an issue with issuing the permits from North West Natura conservation side.

The darting procedure took place on an afternoon. I darted the female with her two cubs, a male and female, whilst they were feeding on a Blue wildebeest carcass. After being immobilised, a radio collar was fitted to the female and they were loaded into three transport crates and loaded on the back of two vehicles. At the same time Dr Griesel and Gus van Dyk darted the adult male in a different part of Tswalo. He was also fitted with a radio collar, craled and loaded.

We set off at approximately 20h00 from Tswalo on our way to Nuutbegin. Gus and Dylan accompanied us in their own vehicle to Nuutbegin to be with when we off load them. The journey took about 6 hours on road and we off loaded them safe in the holding boma at Nuutbegin.

The morning we inspected them and were happy to see that they are well and no fighting between the male and the cubs. Gys and Dylan were also satisfied and left at about midday on their way back to Tswalo.

These lions have never been bred in a captive facility. They were wild roaming lions originating from the then Kalahari Gemsbok National Park. They are still to this wild and free roaming on Nuutbegin. During 2016 the collars of both the male and female were removed as they stopped working.

Dr G S Scheepers BVSc
D99/4295

16th February 2018

John Power
Terrestrial Ecologist
North-West Province

Dear Mr Power,

Oppenheimer & Son and its subsidiaries, protect and conserve a network of conservation areas throughout southern Africa, where conservation of landscapes and their animal and plant communities are assured. Some of our reserves are large enough to stock large carnivores, such as the lion *Panthera leo*, i.e. Tswalu Kalahari Reserve.

We endeavour to protect lions that are self-sustaining as far as their forage requirements are concerned, while dispersal is facilitated by translocations to ensure gene flow elsewhere, within the framework as suggested by the Lion Biodiversity Management Plan (Lion BMP). Following this, we have, and will continue to translocate lions to other suitable destinations. These lions are wild, yet managed, and will go to receiving destination of the same nature. In this, either sales, or donations are made, and we are fully versant with the nature of the receiving populations, such that no animals will be sent to captivity or any places of questionable nature.

None of our properties have captive facilities which harbour lions, and neither do we/ or have entertained the prospects of any transactions related to captive-bred lions. In fact, as a conservation entity, we are strongly opposed to the captive-bred lion industry, and we absolve ourselves from any association with this industry.

Please feel free to contact me should you have any queries.

With very best wishes,

Dr Duncan MacFadyen

Manager: Research and Conservation
Oppenheimer Generations

Tel: +27 11 274 2184
Fax: +27 11 274 2185
Cell: +27 83 379 2139

www.oppenheimerproperties.com

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: jbenge@nwpg.gov.za

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24.04.2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail: JPower@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Diereklinlek dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.

.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER 10548

NAME OF ISSUING AUTHORITY	
NAME	DACERD
ADDRESS	JK BUILDING, MARKET STR P.O. BOX 112, VRYBURG 8600
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	–
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorstershoop		Nature Reserve
ADDRESS	–		–
TOWN	Vorstershoop		Vorstershoop
POSTAL CODE	8615		–
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	–
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PHYSICAL ADDRESS OF FACILITY	Vorstershoop
TOWN	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tswalu Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorstershoop North West Province. Lions to be Kept in Pre-Release Boma's on Nuutbegin

NAME AND SURNAME OF PURCHASER/SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	Tswalu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM 2012-01-16	TO	2012-02-16
RECEIPT NUMBER	R50-00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP			

Department of Agriculture, Conservation, Environment & Rural Development
Dr Ruth Segomotsi Mompati District
16-01-2012
Posbus/P.O. Box 112,
Vryburg 8600

VISION PRINTERS TEL 018 [illegible]

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTERED WITH [redacted]

EPN-142104

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)		Free State (FS)		Gauteng (GP)		Limpopo Province (LP)		Noth West (NW)	X	Mpumalanga (MPA)		Western Cape (CNC)		Eastern Cape (EC)		Nothern Cape (NC)	

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo PARK, PTA
Code 0181
I.D. No: 8311075037088
PH Permit No: PH-010/05/2018 NW
Date: 25/06/2018 Signature

CLIENT

Name: JACOB WALTON WILLIAMS
Permanent Postal Address [redacted]
[redacted] Alamo, TX
Code 78261 Country USA
Passport No: [redacted]
Tel/Fax: N/A
Date: 25/06/2018 Signature

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th STREET
Menlo PARK PTA
Code 0181
I.D. No: 8311075037088
Tel: 0835131451 Fax:
PH Permit No: HO-003/04/2018 NW
Date: 25/06/2018 Signature

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NUULBEGIN		DAVID GREEF	DRSM00372/5/	19/06/2018	LIONESS	1	X		SKULL SKIN SKIN INCL 12 CLAWS
DRSM06/06/2018 -		NUULBEGIN	2018						
201 - 203NW		R0375	NW2799/05/2018						
NWR04/420/0000 1		VORSTERSHOOP							

Copies: Client Original (White)
1st copy (Pink) Foward to Nature Conservation Authority where hunt took place
Hunter Outfitter 2nd Copy (Blue) Retain for a period of three years
Professional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBA
Code:
Country: Trophy Export Date (Estimate):

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act No.3 of 1973; (2) Transvaal Nature Conserv. Ordinance, No.12 of 1983; (3) Cape Nature Environmental Conservation Ordinance, 19 c 1974

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname	Celliers	Building		P O Box	17
Full Name	Dr David	Street	Rd 375 Vorstershoop to Mokopong	Post Office	Vorstershoop
Id Number	3604095013088	Suburb			
Passport	N/a	Town	Vorstershoop	Town	Vorstershoop
Cell Home	0836302534 home 053 939 0100	Area Code	8615	Postal Code	8615
Tel Home	053 939 0100	Division/Region	Dr Ruth Segomotsi Mompati	District/Region	Dr Ruth Segomotsi Mompati
Tel Work	053 939 0100	Province/State	NW	Province/State	Nort West Provinc
Fax Home	053 939 0101	Country	South Africa	Country	South Africa
Email	digriesel@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property
Property Name: NWUTBFGIN NATURE RESERVE
Building:
Street:
Suburb:
Town:
Area Code:
Division/Region:
Province/State:
Country:

Stamp if applicable

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:02 AM

Stamp of Issuing authority

Permit holder / Oasis

VALIDITY PERIOD
FROM 29/05/2018 TO 28/07/2018

Signature of Issuing Authority
(Bontle Ranganye)

30 May 2018, 09:02 AM

Signature of Permit Hol
(Dr David Grisel)

30 May 2018, 09:02 AI

North West Department of Rural, Environment and Agricultural Development, (READ), Cor. Dr. James Moroka Drive & Stadium Road, P
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, e-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

ADDENDUM

PROPERTIES

Name	Town	Province	Country
MAITBEGIN NATURE RESERVE			

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Female	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	0834513451

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	0834513451

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
JACOB WALTON WILLIAMS	(b) (6)	17/06/2018	25/06/2018	(b) (6)

ACTIVITIES

Activity Name
Hunt

Jacob Williams

METHODS

Method Name
375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Di Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This p valid only - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the s methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This p only deemed valid - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signa the permit holder has been endorsed thereon in ink. 5) The Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permi time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protecte Natural Park, Provincial Nature Reserve or privately owned land and - a) the permit holder must beforehand obtain all other relevant permissions, documents, rights and licenses. b) the permit holder must comply with any other / further conditions or restrictions that the rel landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized 12) An authorised person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register re the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days - a) after perfor completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall a the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date there Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback rep been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and stand existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to wh permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By sign permit, the permit holder declares that he / she is aware of the fact that - a) any transgression or failure to return the original permit or fa render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fe to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (375 of an inch H&H) is used to hunt elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a p

Signature of Issuing Authority
(Bonto Manganye)

30 May 2018, 09:02 AM

Signature of Permit Hol
(Dr Davis Grieser)

30 May 2018, 09:02 AI

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, I
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:dengs@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant natu conservation appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as w anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use: a) a fire-arm barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebe antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, r hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must: a) obtain the written perm prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as pre applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild a / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provid hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is imp distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to an organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties the permit holder

Signature of Issuing Authority
(Borna Mangamya)

30 May 2018, 09:02 AM

Signature of Permit Ho
(Dr David Grimsel)

30 May 2018, 09:02 A

North West Department of Rural, Environment and Agricultural Development. (READ), Cor. Dr. James Moroka Drive & Stadium Road,
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdengel@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch X Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? X Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching.

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

S 25° 28.36' E 022°53.79' - Nearest town is Vorstershoop and the Nearest City is Vryburg

   g. If the concession borders a national park, please provide the park name: _____
   h. Description of general and distinctive habitat features and any water features:

As it is in the Kalahari, it is Semi And Desert. The Rainfall is low, but the reserve has a very good infrastructure of waterpo holes by means of a underground well and pumping facilities to keep water throughout the reserve

3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? X Yes __ No
   a. If so, estimated number of people or villages around the concession? approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]
   a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance
   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both
   c. Months during which anti-poaching patrols are conducted: year round
   d. Number of anti-poaching patrols per month: Daily
   e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms
   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS
   g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No
   h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No
   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other:				
Other:				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

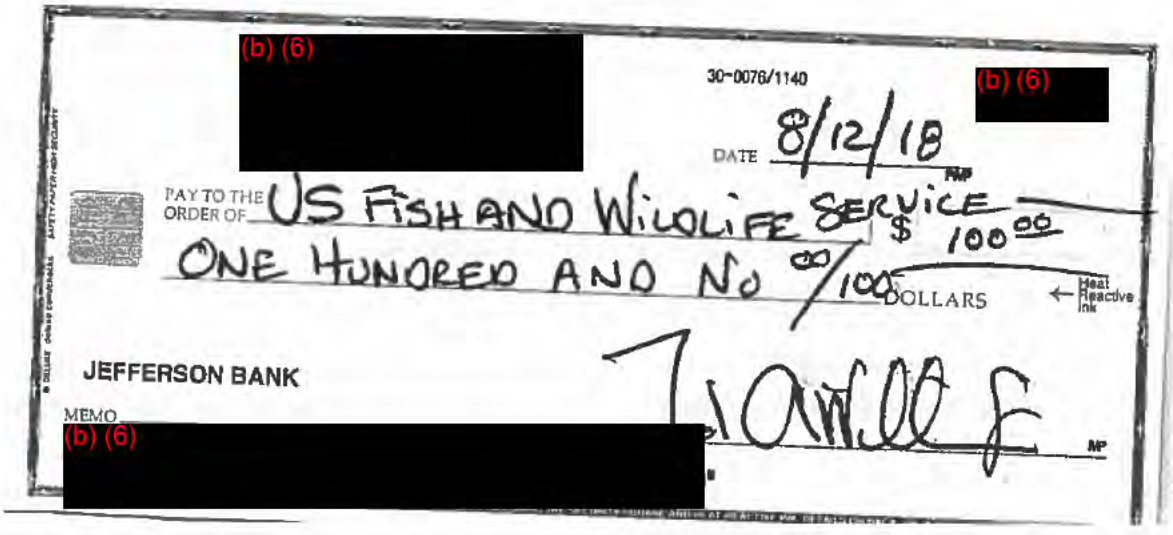
14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

RCVD AUG 23 2018



CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

August 22, 2018

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

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD AUG 23 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 Lion RSA/WM

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Aguilar	Roy	Edward	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. Email
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, T

(b) (6)

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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)

07-28-2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

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.

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

Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. 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

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:

b. Date wildlife is to be hunted:

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

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:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

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

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

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]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

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).

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:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

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?

SEE ATTACHED

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?

SEE ATTACHED

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

SEE ATTACHED

OMB Control No. 1018-0093
Expires 08/31/2020

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: _____ Date: 07-28-2018

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).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

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 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: Roy E A

Name: ROY E AGUILAR

Date: 7-28-18

16th February 2018

John Power
Terrestrial Ecologist
North-West Province

Dear Mr Power,

Oppenheimer & Son and its subsidiaries, protect and conserve a network of conservation areas throughout southern Africa, where conservation of landscapes and their animal and plant communities are assured. Some of our reserves are large enough to stock large carnivores, such as the lion *Panthera leo*, i.e. Tswalu Kalahari Reserve.

We endeavour to protect lions that are self-sustaining as far as their forage requirements are concerned, while dispersal is facilitated by translocations to ensure gene flow elsewhere, within the framework as suggested by the Lion Biodiversity Management Plan (Lion BMP). Following this, we have, and will continue to translocate lions to other suitable destinations. These lions are wild, yet managed, and will go to receiving destination of the same nature. In this, either sales, or donations are made, and we are fully versant with the nature of the receiving populations, such that no animals will be sent to captivity or any places of questionable nature.

None of our properties have captive facilities which harbour lions, and neither do we/ or have entertained the prospects of any transactions related to captive-bred lions. In fact, as a conservation entity, we are strongly opposed to the captive-bred lion industry, and we absolve ourselves from any association with this industry.

Please feel free to contact me should you have any queries.

With very best wishes,

Dr Duncan MacFadyen

Manager: Research and Conservation
Oppenheimer Generations

Tel: +27 11 274 2184
Fax: +27 11 274 2185
Cell: +27 83 379 2139

www.oppenheimerproperties.com

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With very best wishes,

Dr Duncan MacFadyen

Manager: Research and Conservation
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Tel: +27 11 274 2184
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Cell: +27 83 379 2139

www.oppenheimerproperties.com

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: [illegible]

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24/04/2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail: JPower@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Dierekliniek dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.

.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER

NAME OF ISSUING AUTHORITY	
NAME	DAERD
ADDRESS	JK BUILDING, MARKET STR P.O. BOX 113, VRYBURG 8600
	NORTH WEST PROVINCE
PROVINCE	

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	-
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorstershoop		Nature Reserve
ADDRESS	-		-
TOWN	Vorstershoop		Vorstershoop
POSTAL CODE	8615		-
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PHYSICAL ADDRESS OF FACILITY	Vorstershoop
DISTRICT	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tshaly Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorstershoop North West Province. Lions to be Kept in Pre-Release Boma's on Nuutbegin

NAME AND SURNAME OF PURCHASER/SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	Tshaplu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM: 2012-01-16	TO:	2012-02-16
RECEIPT NUMBER	R50.00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP			

Department of Agriculture, Conservation, Environment & Rural Development
Dr Ruth Segomotsi Mompati District
16-01-2012
Posbus/P.O. Box 112,
Vryburg 8600

VISION PRESS TEL

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch X Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? X Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching.
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
S 25° 28.36' E 022°53.79' . Nearest town is Vorstershoop and the Nearest City is Vryburg
   g. If the concession borders a national park, please provide the park name:
   h. Description of general and distinctive habitat features and any water features:
As it is in the Kalahari, it is Semi Arid Desert. The Rainfall is low, but the reserve has a very good infrastructure of watering holes by means of a underground well and pumping facilities to keep water throughout the reserve

3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession?
4. Are there communities bordering this concession? X Yes __ No
   a. If so, estimated number of people or villages around the concession?
approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

c. Months during which anti-poaching patrols are conducted: year round

d. Number of anti-poaching patrols per month: Daily

e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS

g. Do you offer rewards to poaching informants leading to arrest? x Yes __ No

h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

LP NO 142163

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)		Free State (FS)		Gauteng (GP)		Limpopo Province (LP)		Noth West (NW)	X	Mpumalanga (MPA)		Western Cape (CNC)		Eastern Cape (EC)		Nothern Capo (NC)	

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th Street
MENLO PARK, PTA
Code 0181
I.D. No: 8211075037088
PH Permit No: PH-010/04/2018 NW
Date: _____ Signature _____

CLIENT

Name: Roy EDWARD AGUILAR
Permanent Postal Address: [redacted]
SAN ANTONIO, TX
Code 78260 Country USA
Passport No [redacted]
Tel/Fax: [redacted]
Date: 25/06/2018 Signature _____

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th STREET
MENLO PARK, PTA
Code 0181
I.D. No: 8311075037088
Tel: 0834613451 Fax: _____
PH Permit No: HO-003/04/2018 NW
Date: _____ Signature _____

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NUUB BEGIN		DAVID GRIESEL	DRSM00376/S/2018	16/06/2018	LION	1		X	SKULL, HORN, FULL SKIN
DRSM06/06/2016-		NUUBEGIN	NW2812/05/2018						INCL 18 CLAWS
201-203 NW		RO375							
WR04/426/00001		VORSTERSHOP							

Copies: Client Original (White)

1st copy (Pink) Foward to Nature Conservation Authority where hunt took place

Hunter Outfitter 2nd Copy (Blue) Retain for a period of three years

Professional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBA

Code: _____

Country: _____ Trophy Export Date (Estimate): _____

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974.

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname:	Griesel	Building:		P.O Box	17
Full Name:	Dr David	Street:	Rd 375 Vorstershoop to Mokopong	Post Office:	Vorstershoop
Id Number:	3604095013088	Suburb:			
Passport:	N/a	Town:	VORSTERSHOOP	Town:	VORSTERSHOOP
Cell Home:	0836302534 home: 053 939 0100	Area Code:	8615	Postal Code:	8615
Tel Home:	053 939 0100	Division/Region:	Dr Ruth Segomotsi Mompati	District/Region:	Dr Ruth Segomotsi Mompati
Tel Work:	053 939 0100	Province/State:	NW	Province/State:	North West Province
Fax Home:	053 939 0101	Country:	South Africa	Country:	South Africa
Email:	dgriesel@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property

Property Name:	NUUTBEGIN NATURE RESERVE
Building:	
Street:	Rd 375 Vorstershoop to Mokopong
Suburb:	VORSTERSHOOP
Town:	VORSTERSHOOP
Area Code:	8615
Division/Region:	VRYBURG
Province/State:	North - West
Country:	South Africa

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:05 AM

Stamp of Issuing authority

VALIDITY PERIOD
FROM 29/05/2018 TO 28/07/2018

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority
(Bontle Nadanye)
30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr David Griesel)
30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ); Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za

ADDENDUM

PROPERTIES

Name	Town	Province	Country
NUUTBEGIN NATURE RESERVE	VORSTERSHOOP	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
ROY EDWARD AGUILAR	(b) (6)	12/06/2018	25/06/2018	(b) (6)

ACTIVITIES

Activity Name
Hunt

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is - The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) The Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or instructions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) An authorised person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this permit, the permit holder declares that he / she is aware of the fact that - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of

Signature of Issuing Authority
(Bontle Mangamye)
30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr DAVID Griesel)
30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za

ADDENDUM

twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm having a barrel of a caliber of 6,5 mm (.25E of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting licence and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties assisting the permit holder.

Signature of Issuing Authority
(Bertie Manganye)

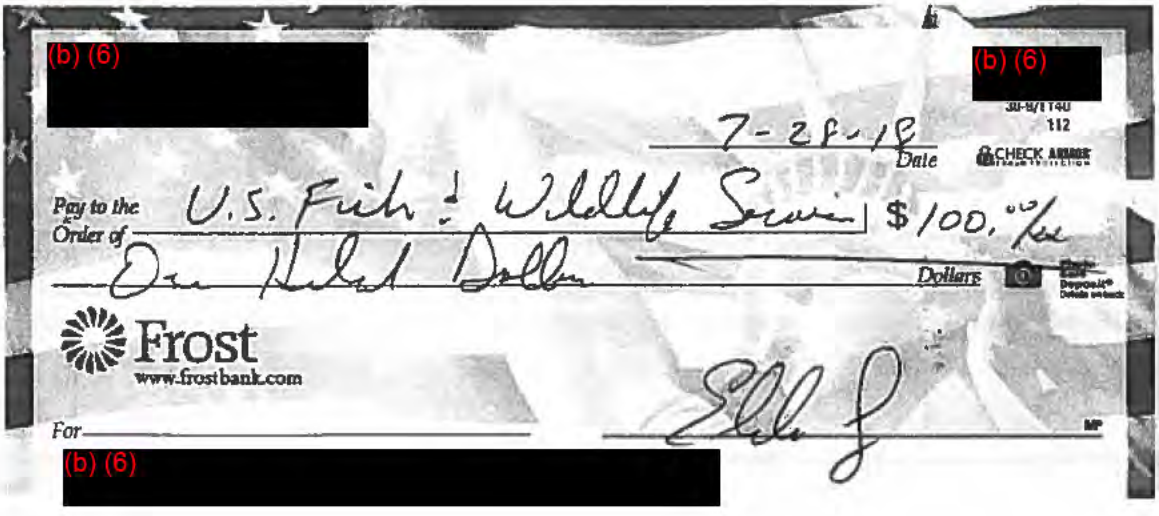
30 May 2018, 09:05 AM

Signature of Permit Holder
(Dr David Griesel)

30 May 2018, 09:05 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenpa@nwpg.gov.za

RCVD AUG 23 2019



CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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August 22, 2018

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

RE: Import applications for RSA Wild Managed Lion Trophies for Fredd Williams, Jacob Williams and Edward Aguilar

Dear Chief Cogliano:

Enclosed please find three applications to import "wild managed" lion trophies that were hunted in the Republic of South Africa. Also attached to each permit application is the 2018 Operator Enhancement report from Graceland Safaris, the hunting operator in this instance.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

encl:

- Edward Aguilar's Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Jacob Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation
- Fred Williams' Wild Managed Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RSA

Type of Activity Wild managed Lion

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

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Williams	Fred	Allen	(b) (6)

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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)

Fred A Williams (b) (6) 07/28/2019

Please 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.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. 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

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:

b. Date wildlife is to be hunted:

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

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:

Nuutbegin Nature Reserve, Vorstershoop, North West Providence, South Africa

b. Date wildlife was hunted:

June 12-24, 2018 (Date of harvest June 14,2018)

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

Graceland Safaris, Rowan Zerf Outfitter Permit No. HO-003/04/2018NW PH Permit No. PH-010/04/2018NW

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]:

P&A Hunters cc P.O. Box 332, Bela Bela 0480. Farm 34, Droogekloof, Bela Bela 0480 Republic South Africa

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).

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:	Peter de Villiers
Business Name:	P & A Hunters cc
Address:	PO Box 332 Bela Bela 0480
City:	Farm 34, Droogekloof, Bela Bela 0480
State/Province:	Republic South Africa
Country, Postal Code:	

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?

SEE ATTACHED

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?

SEE ATTACHED

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

SEE ATTACHED

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 ye(b) (6)

Applicant's signature: _____ Date: 7/28/2018

Be aware that there may be additional permitting or approval r ts 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).

9.a. (page 4)

Four Lions were introduced from the Tswalo Reserve in 2012. This has swelled to a current group of over 40 lions. There are no spotted Hyena, Leopard or Cheetah left on the reserve as a result of the lion burden. Since all of the males came from the same family there has been no evidence of the males killing off any of the offspring. The Lioness' are breeding incredible well and the survival rate of the cubs is high due to no other predation threat present.

9.b. (page 4)

The Licenses and trophy fees are allocated to the local government Nature Conservation for wages and salaries to further conserve the species and to give the land owners incentives to continue to conserve the species. The land owner is currently face with an overpopulation situation with his lions and they are having a detrimental effect on other species of wildlife on the reserve. The trophy fees have contributed to the staff salaries on the reserve and a large portion towards the anti-poaching units deployed on the reserve to safeguard the lions against the illegal lion bone trade as well as funding for extra armed security for the help protect the reserve's rhinos from being poached. This hunt was the first lion hunt on the reserve since the lions were introduced in 2012. The need to manage the numbers of lions has become a pressing matter as well as needing to raise funds for the aforementioned rhino anti-poaching unit after seven rhinos were poached last year alone.

9.c. (page 4)

The financial contribution of trophy hunting has provided an opportunity to employ members of the poverty stricken local community surrounding the reserve. In the past, hunger and lack of jobs or income has forced people to cross the border from Botswana side to set snares, traps and poach bush meat to feed their families. Having a reserve like Nuutbegin in the Vorstershoop region has begun to remedy some of these problems as people are now being employed by the local taxidermist, butchery and as camp staff and maintenance crew.
The owner is looking to introduce a new bloodline into the reserve to avoid inbreeding, which is costly. In hunting some of the lions on the reserve it provides him with funding to purchase and translocate lions from another region. Removal of some of the dominate reserve lions will also allow for a better opportunity of survival of the new translocated lions into the reserve.

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 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: Fred A Williams (b) (6) [redacted]

Name: FRED A WILLIAMS (b) (6) [redacted]

Date: 6/28/18

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 460, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zclg@vodamail.co.za

12 February 2018

To Whom It May Concern
Veterinary statement

Re: Origen of the Nuutbegin Natuur Reservaal Lions.

I, Gerhardus Scheepers, ID 7404265006087, a veterinarian registration number D99/4295, state that the following information is true and correct as given in the sentences below.

I did the darting and relocation of 4 lions from Tswalo to Nuutbegin in late January 2012. I travelled with them from Tswalo to Nuutbegin and off loaded in the temporary holding boma before being released onto the Reserve.

This all happened between 19 and 22 January 2012. We had to stay a day longer at Tswalo before we could dart and load the lions due to an issue with issuing the permits from North West Nature conservation side.

The darting procedure took place on an afternoon. I darted the female with her two cubs, a male and female, whilst they were feeding on a Blue wildebeest carcass. After being immobilised, a radio collar was fitted to the female and they were loaded into three transport crates and loaded on the back of two vehicles. At the same time Dr Griesel and Gus van Dyk darted the adult male in a different part of Tswalo. He was also fitted with a radio collar, crated and loaded.

We set off at approximately 20h00 from Tswalo on our way to Nuutbegin. Gus and Dylan accompanied us in their own vehicle to Nuutbegin to be with when we off load them. The journey took about 6 hours on road and we off loaded them safe in the holding boma at Nuutbegin.

The morning we inspected them and were happy to see that they are well and no fighting between the male and the cubs. Gys and Dylan were also satisfied and left at about midday on their way back to Tswalo.

These lions have never been bred in a captive facility. They were wild roaming lions originating from the then Kalahari Gemsbok National Park. They are still to this wild and free roaming on Nuutbegin. During 2016 the collars of both the male and female were removed as they stopped working.

Dr G S Scheepers BVSc
D99/4295

ZODIAC DIEREKLINIEK

Registrasie no: 2003/089560/23 FC12/12051
DR. GS SCHEEPERS BVSc.
31 CAREL DE WET WEG BRITS.
POSBUS 460, BRITS 0250
TEL: 012 252 1266 FAX: 012 252 6357
EMAIL: zdg@vodamail.co.za

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Dr G S Scheepers BVSc
D99/4295

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5777
Fax: +27(18) 389 5640
E-mail: [illegible]

Dr D.L Griesel
P O Box 17
Vorstershoop
North West Province
8615

E-mail: dlgriesel@gmail.com
Cell: 083 6302534

Dear Dr Griesel

SUBJECT: CONFIRMATION OF CLASSIFICATION OF YOUR NUUTBEGIN NATURE RESERVE'S LION POPULATION AS WILD MANAGED

1. Chapter 5 of the Lion Biodiversity Management Plan (BMP) published in terms of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) outlines a meta-population plan for Managed Wild Lions (MWL) in South Africa. The plan proposes a national management system composed of linked regional nodes of properties that simulate a meta-population approach whereby different lion groups living on different properties make-up a node's population, i.e. a single population as if these prides were living together.

2. These populations (nodes) should have different vital rates (i.e. births, deaths, dispersal events, colonization etc.), and there should be some occasional dispersal between populations as well as regular movements between properties within nodes; and Implementation of the national management system will thus mimic population and meta-population dynamics, which in-turn would promote genetic diversity and reduce inbreeding risks.

3. On your request, the Department of Rural, Environment and Agricultural Development (READ), extensively conducted verification work in determining the status of lion population on your Nuutbegin Nature Reserve.

4. We have perused various documentations, including those submitted by yourself as well as the affidavit you made under oath, as portfolio of evidence to ascertain the state of wildness of the said population. And, the department has concluded, from all evidence provided and the scientific report compiled, that indeed the lion population on Nuutbegin Game Reserve can be classified as **Wild Managed Lions** as defined in the Lion Biodiversity Management Plan which is nationally mandated.

5. Attached for your perusal is the scientific report compiled which elaborates on the findings. And, any utilization of the said lions must be in accordance with *the guidelines for the implementation of a meta-population management plan for managed lions in South Africa "SA-2017-9-Add1"*, with specific reference to trophy hunting.

We look forward for your participation in the forging of the Kalahari Savanna Node for Wild Managed Lion management.

Yours Sincerely,

MR. M.J. DENGA
DIRECTOR – BIODIVERSITY MANAGEMENT
DATE: 24.04.2018

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

AgriCentre Building
Cnr. Dr. James Moroka
& Stadium Rd
Private Bag X2039,
Mmabatho 2735
Republic of South Africa

DIRECTORATE: BIODIVERSITY MANAGEMENT

Tel: +27 (18) 389 5568
Cell: 0761982502
E-mail: JPower@nwpg.gov.za

SCIENTIFIC REPORT

SUBJECT : CLASSIFICATION OF NUUTBEGIN NATURE RESERVE LIONS AS A MANAGED WILD POPULATION

19 FEBRUARY 2018

1. BACKGROUND

The Lion (*Panthera leo*) Biodiversity Management Plan (BMP) which was produced in 2015 defined the various categories into which lions are kept and managed in South Africa. These were of three types, firstly, a) captive-bred lions, which are typically kept in small enclosures, and are entirely dependent on humans to provision their food, and they are managed in a highly intensive way, where even their breeding is manipulated for optimal production. Secondly, there are 'managed wild lions', which roam free on fenced in game farms or nature reserves where they are less intensively managed and the lions can sustain themselves from prey they capture, while they can exercise their own choice when it comes to breeding. Thirdly, there are wild lions, which occur in this country only in very large ecosystems, such as the Kgalagadi and Kruger systems. In the North West, the first two categories are applicable.

In 2016 NW READ submitted a list of reserves with details on their area size, population size, and management types to SANBI, so they can be categorised according to the Lion BMP. All four reserves (Madikwe, Pilanesberg, Khamab & Nuutbegin) were assigned to the 'Wild managed lions' category.

The lion population of Nuutbegin Nature Reserve has his grown to about 40 since the introduction of 4 lions in 2012 and hunting is considered to control the population size.

population as the trophies cannot be exported under the CITES source code W, and at present the USA does not allow the import of captive-bred lion trophies (source code C). The Nuutbegin population management adheres to these principles and compliance with US F&WS requirements.

2. PURPOSE

To classify the Nuutbegin Nature Reserve lion population as a wild managed population.

3. DELIBERATIONS

3.1. Nuutbegin acquired 4 lions (2 males/ 2 females) from Tswalu Kalahari Reserve in 2012 (see attached copy of permit no. 648). There are currently about 40 lions on Nuutbegin.

3.2. The founder population of Tswalu was obtained from free roaming lions originating from the Kgalagadi National Park (See attached letters from E. Oppenheimer & Son (PTY) Ltd. dated 16 February 2016 and Zodiac Dierekliniek dated 12 February 2018).

3.3. The lions were let out of the pre-release boma on Nuutbegin 10 weeks after arrival.

3.4. No other lions have been introduced to Nuutbegin NR (affidavit Dr Griesel dated 19 February 2018).

3.5. Nuutbegin is 23 000ha in extent and the lions exclusively live of the free roaming wildlife occurring on the farm.

3.6. The founder population of the lions on Khamab Kalahari Reserve Nuutbegin NR also originated from Tswalu. The Khamab population is classified as managed wild.

4. RECOMMENDATION

BSS hereby confirms that the lion population on Nuutbegin NR is managed as a wild population, with only population management to maintain numbers within the limits of the size of Nuutbegin NR.

.....

Mr Daan Buijs, MSc, *Pr. Sci. Nat.*

Senior Scientist: BSS

19 Feb 2018

.....

Mr Willem Boshoff , MSc, *Pr. Sci. Nat.*

Deputy Director: BSS

19/2/2018

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER

NAME OF ISSUING AUTHORITY	
NAME	DACERD
ADDRESS	1K BUILDING, MARKET STR P.O. BOX 112, VRYBURG 8600
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	DR. DAVID. L	ID NO	3604095013088
SURNAME	GRIESEL	PASSPORT NO	-
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	P.O. Box 17		Nuutbegin
ADDRESS	Vorsterskoop		Nature Reserve
ADDRESS	-		-
TOWN	Vorsterskoop		Vorsterskoop
POSTAL CODE	8615		-
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Dr. D.L Griesel
NAME AND SURNAME RESPONSIBLE PERSON	Dr. D.L Griesel
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Nuutbegin Nature Reserve
PHYSICAL ADDRESS OF FACILITY	Vorsterskoop
DISTRICT	Dr. Ruth Segomotsi Mompati
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Transport of 04 Wild Lions From Tswalu Kalahari Reserve (Northern Cape) to Dr. D.L Griesel, Nuutbegin Nature Reserve, Vorsterskoop North West Province. Lions to be Kept in Pre-Release Camp's on Nuutbegin

NAME AND SURNAME OF PURCHASER/SELLER	G. van Dyk
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	Tswalu Kalahari Reserve

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION			
PERIOD OF VALIDITY	FROM: 2012-01-16	TO:	2012-02-16
RECEIPT NUMBER	R50-00 Direct Deposit		
K.R KGETSANE			
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP		Department of Agriculture, Conservation Environment & Rural Development Dr Ruth Segomotsi Mompati District 16-01-2012 Postbus/P.O. Box 112, Vryburg 8600	

VISION PRESS TEL

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

LP NO! 42162

Durration of Guiding Commenced 12 / 06 / 2018 Terminated 25 / 06 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo Park, PTA
Code 0181
I.D. No: 8611045037088
PH Permit No: PH-010/04/2018 NW
Date: 25/06/2018 Signature

CLIENT

Name: FRED A williams
Permanent Postal Address: [redacted]
FERN SAN ANTONIO TX
Code [redacted] Country USA
Passport No: [redacted]
Tel/Fax: [redacted]
Date: 25/06/2018 Signature

HUNTING OUTFITTERS

Name: ROWAN ZERF
Business Address: 71 15th Street
Menlo Park, PTA
Code 0181
I.D. No: 8511075037088
Tel: 0834513451 Fax:
PH Permit No: HO-003/04/2018 NW
Date: 25/06/2018 Signature

Farm Name Registration No:	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No:	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
NUULBEGIN	VRYBURG	DAVID GRIESEL	DRSM003 75/5/	14/06/2018	LION	1		X	SKULL, SKIN FULL SKIN INCL 18 CLAWS
DRSM06/06/2018-201		NUULBEGIN	2018						
203 NW		RO575	NW2813/05/2018						
WR04/420/00001		VORSTERSHAP							

Copies: Client Original (White)

1st copy (Pink) Foward to Nature Conservation Authority where hunt took place

Hunter Outfitter 2nd Copy (Blue) Retain for a period of three years

Professional Hunter Last copy (white) Remains in book

Address to which trophies are to be sent: TBC

Code:

Country: Trophy Export Date (Estimate):

3.

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt .375 Caliber

Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details		Physical Address		Postal Address	
Surname	Gresse	Buildings		P O Box	17
Full Name	Dr David	Street	Rd 375 Vorsterskoop to Makopong	Post Office	Vorsterskoop
Id Number	3604085013088	Suburb			
Passport	N/a	Town	VORSTERSKOOP	Town	VORSTERSKOOP
Cell Home	0836302534 home 053 939 0100	Area Code	8615	Postal Code	8615
Tel Home	053 939 0100	Division/Region	Dr Ruth Segomotsi Mompati	District/Region	Dr Ruth Segomotsi Mompati
Tel Work	053 939 0100	Province/State	NW	Province/State	North West Province
Fax Home	053 939 0101	Country	South Africa	Country	South Africa
Email	digresse1@gmail.com				

REGION

NorthWest

LOCATION

Facility

Property

Property Name	NOUTBEGIN NATURE RESERVE
Building	
Street	Rd 375 Vorsterskoop to Makopong
Suburb	VORSTERSKOOP
Town	VORSTERSKOOP
Area Code	8615
Division/Region	VRYBURG
Province/State	North - West
Country	South Africa

Stamp if applicable

NATURE CONSERVATION PERMIT OFFICE
NORTH WEST PROVINCE
30 May 2018, 09:38 AM

Stamp of Issuing Authority

VALIDITY PERIOD
FROM 29/05/2018 TO 28/07/2018

Permit holder / Dealer

Signature of Issuing Authority
(Sorho Manganye)

30 May 2018, 09:38 AM

Signature of Permit Holder
(Dr David Gresse)

30 May 2018, 09:38 AM

North West Department of Rural, Environment and Agricultural Development. (READ), Cor. Dr. James Moroka Drive & Stadium Road, M
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

AUTHORISATION

PROPERTIES

Name	Town	Province	Country
WARTBEGIN NATURE RESERVE	VORSTERSHOOP	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
ROWAN ZERF	PH-010/04/2018 NW	0834513451	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
ROWAN ZERF	HO-003/04/2018 NW	0834513451	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	
FRED ALLEN JR WILLIAMS	(b) (6)	17/06/2018	25/06/2018	(b) (6)

ACTIVITIES

Activity Name
Hunt

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Di Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This valid only - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) The only deemed valid - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the sign the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permi time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any anim or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protecte National Park, Provincial Nature Reserve or privately owned land and - a) the permit holder must beforehand obtain all other relevant permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the lan landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized 12) An authorised person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register re the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days - a) after perfor completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the together with all other relevant written permissions, documents, rights and licenses for a period of at least (3) two years from date of issue or for as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall a the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date there Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback rep been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to - a) all applicable norms and stand existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to wh permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or c thereto that may be applicable or law required by any other Issuing Authority / Organization / Institute, relating to the permit. 20) By signi permit, the permit holder declares that he / she is aware of the fact that - a) any transgression or failure to return the original permit or fa render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. I permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fe to the Issuing Authority for the issue of this permit shall not be refunded.

HUNT - DANGEROUS GAME

1) The permit holder must ensure that - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt t elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a pe

Signature of Issuing Authority
(Bonke Mangamye)
30 May 2018, 09:38 AM

Signature of Permit Hold
(Dr David Geisler)
30 May 2018, 09:38 AM

North West Department of Rural, Environment and Agricultural Development, (READ), Cor. Dr. James Moroka Drive & Stadium Road, M
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

twenty four (24) months prior to the hunting thereof, e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as well anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or ra wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm h barrel of a caliber of 6.5 mm (256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the re activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhin hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permi prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as presc applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild ani / she shall, before leaving the abovementioned property (or if he / she does not leave it, after each days hunt) record in the space provided hunting licence and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impos distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such or hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties a the permit holder

Signature of Issuing Authority
(Bertha Mangenye)

30 May 2018, 09:38 AM

Signature of Permit Hol
(Dr David Grimsel)

30 May 2018, 09:38 AI

North West Department of Rural, Environment and Agricultural Development. (READ), Cor. Dr. James Moroka Drive & Stadium Road, P
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdesga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: David Griesel
   a. Years in business: 50+
   b. Name of company conducting hunt: Graceland Safaris
   2. Name of concession: Nuutbegin Size in km²: 250
   a. Land tenure: __ Government lease __ Community __ Private ranch X Private conservancy
   b. Length of concession agreement: For the Period of the Hunt Can it be renewed? X Yes __ No
   c. Length of renewal, if applicable: _____
   d. Estimated total amount received in trophy fees last year, if applicable: $ 300,000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   It has not been obligatory, but due to the reserve opening for hunting, members of the local community have been employed by the reserve to facilitate in hunting, game management and more importantly anti-poaching. They have had problems in the past with Rhino Poaching
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   S 25° 28.36' E 022°53.79' - Nearest town is Vanstenhoop and the Nearest City is Vryburg
   g. If the concession borders a national park, please provide the park name: _____
   h. Description of general and distinctive habitat features and any water features:
   As it is in the Kalahari, it is Semi And Desert. The Rainfall is low, but the reserve has a very good infrastructure of watering holes by means of a underground well and pumping facilities to keep water throughout the reserve

3. Are there any communities living in the concession? __ Yes __ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? X Yes __ No
   a. If so, estimated number of people or villages around the concession?
   approx 250 on RSA side, Botswana side Unknown, but likely more
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Elephant	None			
Lion	Dense	45+	4 were introduced in 2012	Aerial and land Survey
Leopard	Sparse	3, but mainly nomadic	Down due to the lions	Sightings and tracks
Prey species	Dense	in the 1000's	Down due to the lions	Aerial and land Survey

6. Total employment number: 25

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	1
Trackers	3	2
Anti-poaching scouts/rangers	4	4
Other anti-poaching	4 - Rhino Anti Poaching	4
Cooks/housekeepers	5	
Community coordinators		
Managers	5	5
Biologists	1	
Others: _____		

7. Number of staff employed in the off-season: All those that remain Local

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	Year round
Managers	3	3	Year round
Maintenance	6	6	Year round
Road opening/ construction	10	10	Contract based
Community relations personnel	unknown		
Others: _____			

8. Anti-poaching efforts:[2]
   a. Number of anti-poaching staff: 8 but when there is evidence of Rhino Poaching, neighbors an extra community members are called upon for additional assistance
   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both
   c. Months during which anti-poaching patrols are conducted: year round
   d. Number of anti-poaching patrols per month: Daily
   e. Description of anti-poaching equipment, vehicles, etc.: Vehicles, Flashlights and limited firearms
   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The SAPS
   g. Do you offer rewards to poaching informants leading to arrest? X Yes __ No
   h. Do you offer rewards to poaching informants upon conviction? __ Yes __ No
   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ZAR

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	32000	35200	38750	
Equipment	20000	20000	20000	uniforms and gear
Vehicles	300000	300000	300000	repayments on vehicles
Petrol	40000	47000	54000	
Rewards paid		15000	19000	Increase in Rhino Poaching
Other:				
Other:				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered		3	7	relating to Rhino

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated			2	
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered			2	
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
Medical services and a mobile clinic is run by the reserve for the local community

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: R10000 meat was donated. There is not a program per say, it is based on how much meat is available as a result of trophy hunting

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
There is no wildlife outside of the reserve as they have all been poached and killed by snares.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Graceland Safaris takes care of their staff families in the form of school fees, medical needs and is currently rebuilding homes of a staff member who's home was burnt down

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Percentage of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

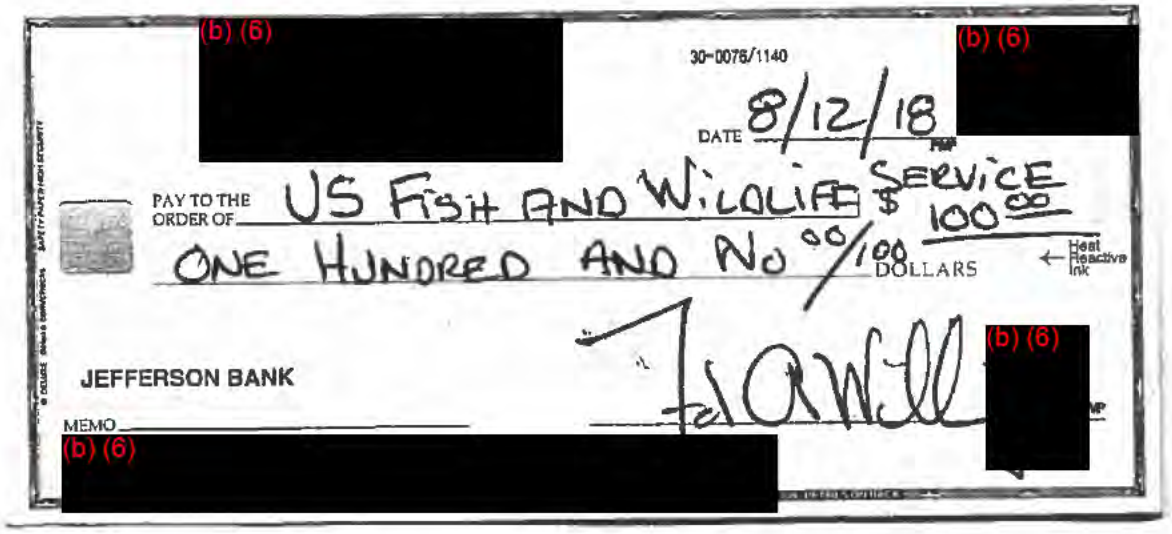
14. I declare that the foregoing is true and correct.

Signature: _____

Name: Rowan Zen Title: Owner

Graceland Safaris has a strict walk and stalk fair chase policy, and all hunting is done by methods of spot and stalk and track and stalk. We only harvest animals that are past their prime and our company ethos is driven by conservation. As we have several concessions throughout the republic, we do our outmost to not exhaust our natural wildlife heritage and rotate our concessions as often as possible and only take the allocated amount of species and numbers on the concessions as prescribed in the beginning of our seasons. We have our own offsite breeding facility of certain game species to ensure continuing increase in numbers of our wildlife. We have an array of trail cams scattered throughout our concessions for research and census purposes.

RCVD AUG 23 2018



(b) (6)

30-0078/1140

(b) (6)

DATE 8/12/18

PAY TO THE ORDER OF US FISH AND WILDLIFE SERVICE $ 100 00

ONE HUNDRED AND NO 00/100 DOLLARS

Heat Reactive Ink

JEFFERSON BANK

(b) (6)

MEMO

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD AUG 31 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Burris	Dana	Robinson	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tucson	Arizona	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of [illegible] applicant)				
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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): 08/22/2018

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 a trophy 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 4-6 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 address as listed in page 1. Self-addressed, pre-paid envelope included herewith.

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

   D. Rob Burris, (b) (6) [redacted]

3. 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?

☒ 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; 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:

Mozambique; Niassa province; Niassa Reserve Hunting Block R2; nearest city is Lichinga, Mozambique

b. Date wildlife is to be hunted:

October 26, 2018 - November 7, 2018

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

Niassa Hunter Safaris LDA; Jorge Carrico, Professional Hunter & Outfitter

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 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 foreign 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). Hunt not yet completed; permits and/or licenses no currently in my possession

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:	
Business Name:	Life Form Taxidermy CC
Address:	No. 7 Aluminium Road, P.O. Box 763
City:	White River
State/Province:	MPumalanga 1240
Country, Postal Code:	South Africa

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

No.

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, local community, or government?

Approximate fees are $40,000 USD; It is my understanding that some percentage of those fees goes to the local communities in the Niassa province. It is also my understanding that some portion of those fees goes to the Niassa Reserve for conservation and anti-poaching efforts.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Niassa Hunter Safaris is actively engaged in wildlife conservation and anti-poaching efforts year-round in its hunting concession. Fees paid to NHS are used to pay for such efforts.

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

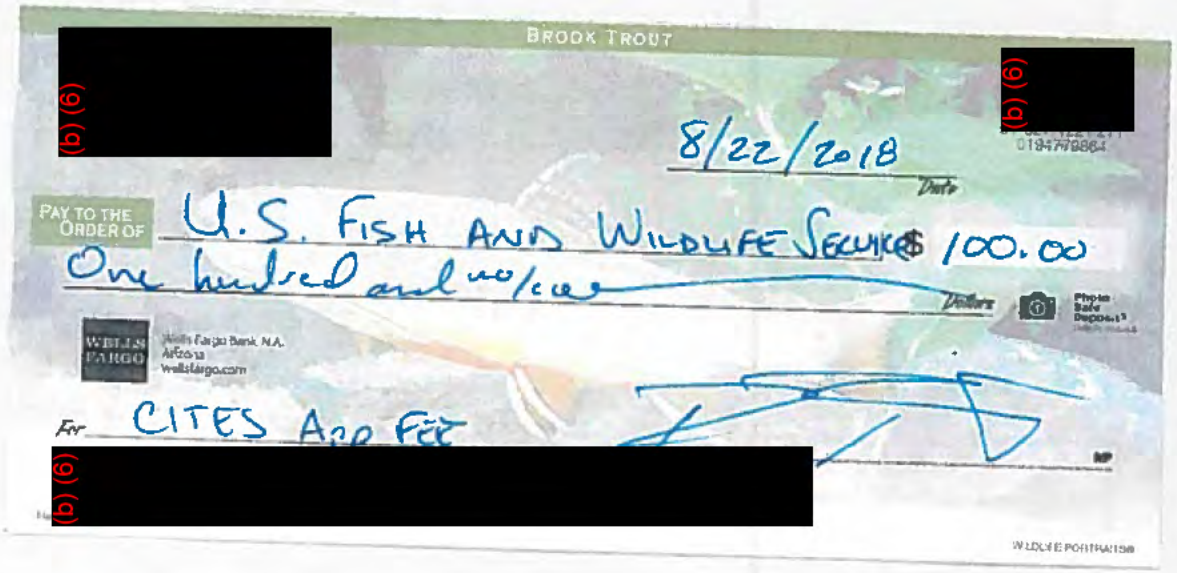
11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 08/22/2018

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 governments 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 shipments 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).


BROOK TROUT
(b) (6)
(b) (6)
0194799864
8/22/2018
Date
PAY TO THE ORDER OF
U.S. FISH AND WILDLIFE SERVICE
$ 100.00
One hundred and no/cents
Dollars
WELLS FARGO
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For CITES App Fee
(b) (6)
WILDLIFE PORTRAITS

RCVD SEP 5 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Jayo	Douglas	(HMN)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Boise	Idaho	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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.

Douglas Jayo — 8-27-18

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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.

   N.A.

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

   (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo melanochaito

   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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN,** 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 was removed from the wild:
   Zambia, Nyakolwe Game Management Area
   Petauke (nearest town)

   b. Date wildlife was hunted:
   23 June 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
Sable Transport/Sydney Kundu

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 foreign export/re-export document]:
Bangweulu Taxidermy Ltd. Plot 4442/K, Chifwemo Road, New Kasamo, Lusaka, Zambia

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).

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: see item d above
Business Name:
Address:
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?
NO

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, local community, or government?
fee: #4,200 No I don't

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 landowner that provide a conservation benefit to the species being hunted/species hunted?
NO

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: Douglas Lacy Date: 8-27-18

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 governments 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 shipments 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).

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0000556

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 04/06/2018

DETAILS OF PERMIT HOLDER

Full name: Douglas Jaya NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No.: E-mail address:

Postal Address: Safe Transport Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 4926 2. 3.

Calibre(s) 1.: 46 2. 30.06 3.

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s)

Bird Hunting Licence No. 0000796

Hunting Type: Non Resident

is hereby authorised to hunt in Nyakolwa G.R Game Management Area,

As Above Hunting block for days from 14/06/18

06/07/18 (Dates inclusive)

Amount Paid: USD

GRZ Receipt No. 0042739

DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 4 JUN 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

NPW FORM 12

ORIGINAL

0000402

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SYDNEY KUNDA NRC/Passport No. (b) (6) [redacted]

Residential Address: CHIEF KAKUMBA PALACE MFUWE

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: SABLE TRANSPORT

DETAILS OF CLIENT

Name of client: DOUGLAS JAYO NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No..... Nationality: AMERICAN

Postal Address SABLE TRANSPORT Residential Address USA

Type of Licence: CLIENT'S Licence No.: 00005556

Date of Issue:..... Place of Issue CHILANGA

No of Hunting Block where hunting was conducted: NYAMKOLUBA ZAMBIA

Hunting period From. 15/06/18 To. 06/07/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
20/06/18	PUKU	M	ONE	NIL	S1358255 E0305736	✓		USD 3000
23/06/18	LION	M	ONE	NIL	S1358255 E0605704	✓		USD 3000
25/06/18	BUFFALO	M	ONE	NIL	S1349971 E0305911	✓		USD 3000

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
PUKU			15"	
LION				
BUFFALO			39 ½"	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 05/07/18 Signature of Client.....

Date 05/07/18 Signature of Professional Hunter.....

Date 05/07/18 Name of Wildlife Police Officer RICHARD SOKOVI

Employment No. of W.P.O. 277497

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Original

NPW FORM 2

S/No. 0000371

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 06/6/18

DETAILS OF LICENSEE

Full Name: DOPGLAS TIAYO NRC No./Passport No.: (b) (6) [redacted]

Nationality: AMERICAN Age: 72 YEARS

Tel/Mobile No: E-mail:

Full Name of Safari Company: Sable Transport

Certificate of Incorporation No. Date of Incorporation:

Postal Address: PIB 219 W USA Residential Address: USA

Firearm Licence/Tourist Firearm Import No.: 492C Calibre of Firearm: 416

Type of Hunt: CLASSICAL

Any other relevant information, which may be considered in support of this application (e.g. previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Nyalolwa Game Ranch	2018	4200
/					

Total Animals fees paid - the kwacha equivalent of US$ 4200
Concession Fees paid - the kwacha equivalent of US$ -
Grand Total the kwacha equivalent of US$ 4200

23/6/18

Chairperson of the Committee

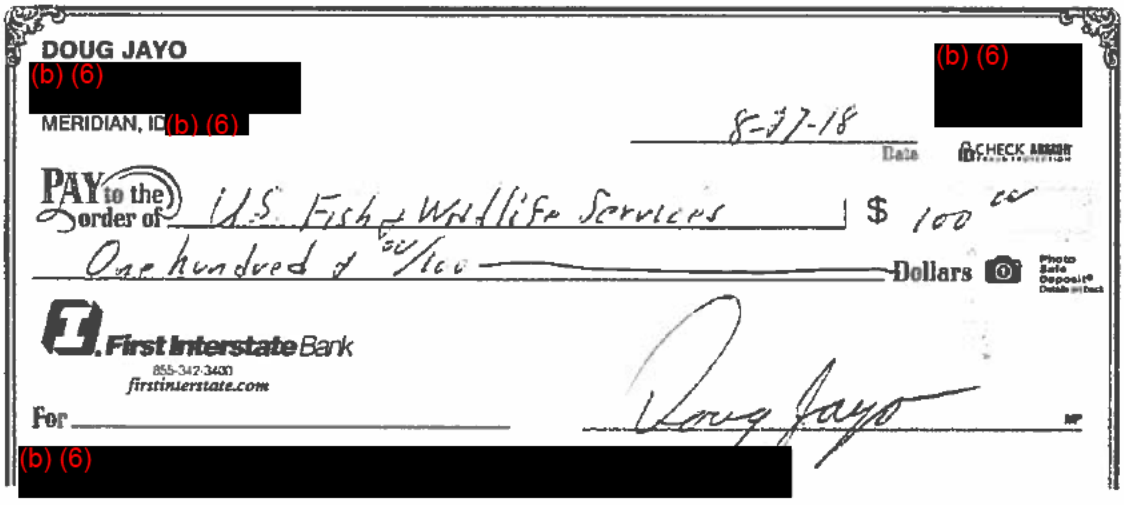
Official Stamp

-6 JUN 2018

Imo000306
Ref 0043539

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

RCVD SEP 6 2018



DOUG JAYO
(b) (6)
MERIDIAN, ID (b) (6)

(b) (6)

8-27-18
Date

CHECK ARREST

PAY to the order of U.S. Fish + Wildlife Services $ 100 00

One hundred 00/100 Dollars

Photo Safe Deposit® Details on Back

First Interstate Bank
855-342-3400
firstinterstate.com

For (b) (6)

Doug Jayo

MP

Barry, Anna <anna_barry@fws.gov>

Cities application # 06121D

Barry, Anna <anna_barry@fws.gov> Wed, Jan 30, 2019 at 5:05 PM
To: Jodie Mogensen (b) (6)
Cc: "Vargas, Darcy" <darcy_vargas@fws.gov>

Dear Mr. Doug Jayo,

Due to the Government being shutdown for 35 days we are assessing the processing of work within the office. We will contact you as soon as we can regarding your application status.

Also, please be aware that in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it was revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we make findings for trophy imports on an application-by-application basis. This new procedure has increase the time-frame for finalizing these types of applications.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Wed, Jan 30, 2019 at 1:07 PM Jodie Mogensen (b) (6) wrote:

> Hello Anna,
>
> Can you give me an estimate on my cities permit application time frame please? My African exporter is asking me.
>
> Sincerely,

Doug

Douglas Jayo

(b) (6)

ON ALL FUTURE CORRESPONDENCE PLEASE EMAIL: (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Tuesday, January 29, 2019 8:05 AM
To: Jodie Mogensen (b) (6)
Cc: Anna Barry <anna_barry@fws.gov>
Subject: Re: [EXTERNAL] RE: Cities application # 06121D

Dear Doug,

My supervisor's name is Anna Barry. She is copied on this email and she can be reached directly at 703-358-1976.

At this time, we are still assessing the effects of the furlough on this office and applications are being reviewed as quickly as possible in the order received.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Jan 21, 2019 at 12:11 PM Jodie Mogensen (b) (6) > wrote:

> Hello Darcy,
>
> Cam you give me a status update on my cities permit application # 06121D or give me your supervisors email address, please?
>
> Thank you,
>
> Doug
>
> *Douglas Jayo*
>
> (b) (6)
>
> **ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE** (b) (6)
>
> **and** (b) (6)
>
> **From:** Vargas, Darcy <darcy_vargas@fws.gov>
> **Sent:** Wednesday, December 19, 2018 2:30 PM

To: Jodie Mogensen [redacted]
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Dec 17, 2018 at 11:41 AM Jodie Mogensen [redacted] wrote:

> Hello Darcy,
>
> Please give me an up date on the status of my permit. I know it was forwarded to you supervisor per you last email. Have you by chance heard anything more?
>
> Thank you,
>
> Doug

Douglas Jayo

(b) (6) [redacted]

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6) [redacted]

and (b) (6) [redacted]

From Varga , Darcy darcy varga @fw gov
Sent: Monday, December 3, 2018 1:42 PM
To: (b) (6) [redacted]
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

An updated status of your referenced application is that the initial review has been completed and the application has been passed on to my supervisor for her review and decision.

Re pectfully,

Darcy Vargas
Biologist

US Fi h and Wildlife Service

MS IA

5275 Lee burg Pike

Falls Church, VA 22041-3803

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www.cites.org

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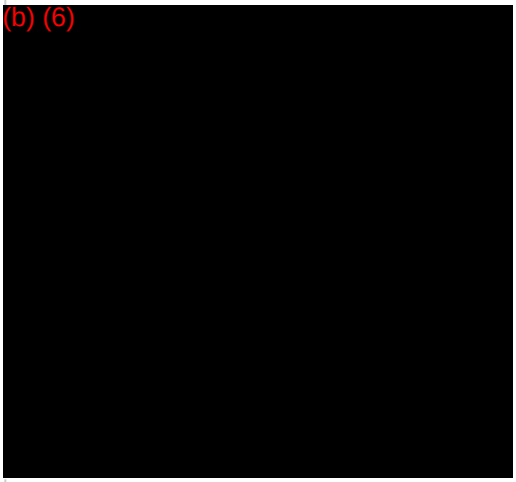
On Mon, Nov 26, 2018 at 1 01 PM Jodie Mogen en (b) (6) wrote

> Darcy,
>
> Thank you for getting back to me la t week My PH in Africa i a king me when I can e pect to get my citie permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.
>
> Sincerely,
>
> Doug

Douglas Jayo

(b) (6)



ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: (b) (6) [redacted]
Subject: Fwd: Cites application # 06121D

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas [redacted]
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>

Darcy,

Could you give them the status of the application.

Thanks,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

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---------- Forwarded message ---------
From: **Jodie Mogensen** (b) (6) >
Date: Mon, Nov 19, 2018 at 11:59 AM
Subject: [EXTERNAL] FW: Cites application # 06121D
To: <anna_barry@fws.gov>

Hello Anna,

Please see the email I sent Darcy copied below… I haven't heard back from Darcy, can you please update me on the progress of my application?

Thanks!

Doug

Douglas Jayo

(b) (6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

From: Jodie Mogensen (b) (6)
Sent: Friday, November 16, 2018 12:45 PM
To: 'darcy_vargas@fws.gov' <darcy_vargas@fws.gov>
Subject: Cites application # 06121D

Hello Darcy,

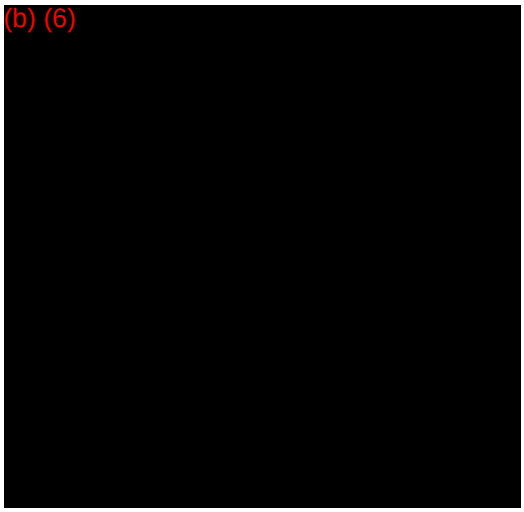
I am inquiring about the status of my cites permit # 06121D which was submitted on August 27, 2018. I did talk to you to get information prior to the submittal. Can you please advise when it will be issued? In case you are not the person I need to ask, could you help me with whom I should be asking? There is a copy or my Cites application attached for your convenience.

Thank you,

Doug Jayo

Douglas Jayo

(b) (6)



ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and(b) (6)

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Wed, Nov 21, 2018 at 10:40 AM
To: (b) (6)

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>
[Quoted text hidden]

181116122808_0001.pdf
187K

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogensen (b) (6) Mon, Nov 26, 2018 at 1:01 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Darcy,

Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.

Sincerely,

Doug

Douglas Jayo

(b) (6)

SE INCLUDE: (b) (6)

and (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: (b) (6)
Subject: Fwd: Cites application # 06121D

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogensen [redacted] Mon, Nov 26, 2018 at 1:01 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Darcy,

Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.

Sincerely,

Doug

Douglas Jayo

[redacted]

PLEASE INCLUDE: [redacted]

and [redacted]

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To: [redacted]
Subject: Fwd: Cites application # 06121D

[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Jodie Mogensen (b) (6) Mon, Dec 17, 2018 at 11:41 AM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Hello Darcy,

Please give me an up date on the status of my permit. I know it was forwarded to you supervisor per you last email. Have you by chance heard anything more?

Thank you,

Doug

Douglas Jayo

(b) (6)

LEASE INCLUDE: (b) (6)

and (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Monday, December 3, 2018 1:42 PM
To: (b) (6)
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Vargas, Darcy <darcy_vargas@fws.gov>

Cites application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Wed, Dec 19, 2018 at 4:30 PM
To: Jodie Mogensen [redacted]
Bcc: Anna Barry <anna_barry@fws.gov>

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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[Quoted text hidden]

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] Recall: Cities application # 06121D

Jodie Mogensen (b) (6) > Mon, Jan 21, 2019 at 12:13 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Jodie Mogensen would like to recall the message, "Cities application # 06121D".

winmail.dat
2K

Vargas, Darcy <darcy_vargas@fws.gov>

[EXTERNAL] RE: Cities application # 06121D

Vargas, Darcy <darcy_vargas@fws.gov> Tue, Jan 29, 2019 at 10:04 AM
To: Jodie Mogensen (b) (6)
Cc: Anna Barry <anna_barry@fws.gov>

Dear Doug,

My supervisor's name is Anna Barry. She is copied on this email and she can be reached directly at 703-358-1976.

At this time, we are still assessing the effects of the furlough on this office and applications are being reviewed as quickly as possible in the order received.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

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On Mon, Jan 21, 2019 at 12:11 PM Jodie Mogensen (b) (6) wrote:

> Hello Darcy,
>
> Cam you give me a status update on my cities permit application # 06121D or give me your supervisors email address, please?
>
> Thank you,
>
> Doug
>
> *Douglas Jayo*
>
> (b) (6)

(b) (6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, December 19, 2018 2:30 PM
To: Jodie Mogensen (b) (6)
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

Your referenced application is still under review by my supervisor.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Dec 17, 2018 at 11 41 AM Jodie Mogen en (b) (6) wrote

Hello Darcy,

Plea e give me an up date on the tatu of my permit I know it wa forwarded to you upervi or per you la t email Have you by chance heard anything more?

Thank you,

Doug

Douglas Jayo

(b) (6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent Monday December 3 2018 1 42 PM
To: (b) (6)
Subject: Re: [EXTERNAL] RE: Cites application # 06121D

Dear Mr. Jayo,

Ref: 06121D

An updated status of your referenced application is that the initial review has been completed and the application has been passed on to my supervisor for her review and decision.

Respectfully,

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

www.fws.gov
www.cites.org

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On Mon, Nov 26, 2018 at 1:01 PM Jodie Mogensen (b) (6) wrote:

> Darcy,
>
> Thank you for getting back to me last week. My PH in Africa is asking me when I can expect to get my cities permit so he can ship my trophies to the US. Please give me an estimate so I can let him know the status of my application.
>
> Sincerely,
>
> Doug
>
> *Douglas Jayo*

(b) (6) [redacted]

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6) [redacted]

and (b) (6) [redacted]

From: Vargas, Darcy <darcy_vargas@fws.gov>
Sent: Wednesday, November 21, 2018 8:40 AM
To (b) (6) [redacted]
Subject: Fwd: Cites application # 06121D

Dear Mr. Jayo,

Your application, # 06121D, that was received on September 6, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. If there is a need for additional information or clarification on information provided in your application, you will contact you directly.

Darcy Vargas
Biologist

US Fish and Wildlife Service

MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

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---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Mon, Nov 19, 2018 at 12:37 PM
Subject: Cites application # 06121D
To: Vargas, Darcy <darcy_vargas@fws.gov>

Darcy,

Could you give them the status of the application.

Thanks,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Jodie Mogensen** (b) (6)
Date: Mon, Nov 19, 2018 at 11:59 AM
Subject: [EXTERNAL] FW: Cites application # 06121D
To: <anna_barry@fws.gov>

Hello Anna,

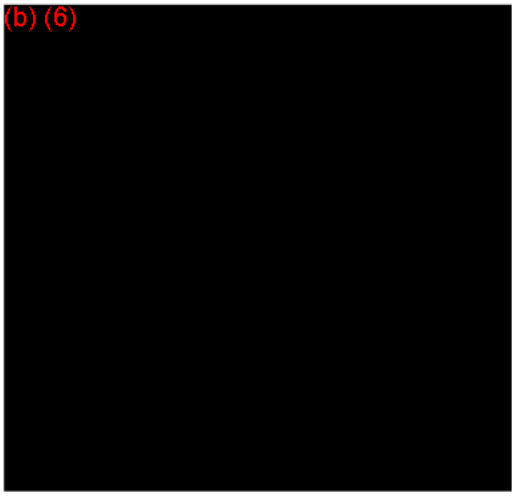
Please see the email I sent Darcy copied below… I haven't heard back from Darcy, can you please update me on the progress of my application?

Thanks!

Doug

Douglas Jayo

(b) (6)



ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

From: Jodie Mogensen (b) (6)
Sent: Friday, November 16, 2018 12:45 PM
To: 'darcy_vargas@fws.gov' <darcy_vargas@fws.gov>
Subject: Cites application # 06121D

Hello Darcy,

I am inquiring about the status of my cites permit # 06121D which was submitted on August 27, 2018. I did talk to you to get information prior to the submittal. Can you please advise when it will be issued? In case you are not the person I need to ask, could you help me with whom I should be asking? There is a copy or my Cites application attached for your convenience.

Thank you,

Doug Jayo

Douglas Jayo

(b) (6)

ON ALL FUTURE CORRESPONDENCE PLEASE INCLUDE: (b) (6)

and (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 06 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Fife	Brian	Keith	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Las Vegas	Nevada	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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)

08/17/2018

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 a trophy 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 4-6 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)?

Brian K. Fife (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Scientific name: Panthera leo melanochaita Common name: African Lion (South African Cape 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:

NA

b. Date wildlife is to be hunted:

NA

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

NA

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Kalahari Desert, Northwest Province, South Africa, GPS coordinates: 25 47' 23.57" S 22 48' 41.74" E
Farm Aurora, nearest city is Vorstershoop, South Africa Code: 8615

b. Date wildlife was hunted:

June 17, 2017 to June 19, 2017

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

Professional Hunter: GG Van Schalkwyk with CMP Safaris

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 foreign export/re-export document]:

Marakalalo Taxidermy (Trophies), 21 Storm Avenue, Bainsvelei; Bloemfontein; Free State, South Africa
PO Box 37268, Langenhovenpark, South Africa 9330

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).
Attached

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: J. Kruger Human
Business Name: Marakalalo Trophies (Taxidermy)
Address: 21 Storm Avenue, Bainsvlei
City: Bloemfontein
State/Province: Freestate
Country, Postal Code: South Africa 9330

(POBox 37268
Langenhoven Park, Bloemfontein
South Africa, 9330)

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

According to IUCN Red list in South Africa the African Lion population has increased 29% since 1993 and hit capacity or over capacity by 2013. Please see attached for more information.

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, local community, or government?

$10,000 to CMP Safaris in addition to the production of marketing material and video, $1,000 to professional hunter, $600 to main tracker, $400 to assistant tracker, $80-$200 each to camp staff(cooks, driver, housekeeper, skinners). Portion of funds feeds young children. Please see attached.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

CMP Safaris helps the government track down poachers of wild lions. They also provide funds to aid lions that are starving in some areas of Africa. They have released captive bred lions into the wild with success. Please see attached.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 08/17/2018

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 governments 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 shipments 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).

Los Angeles, CA
370 Amapola Ave. #114
Torrance, CA 90501
Phone: (310) 328-6307 Fax (310) 328-6399
fwsole_lax@fws.gov

(or (if necessary)
San Francisco, CA
1633 old Bayshore Hwy, Suite 248
Burlingame, CA 94010)

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?

According to the International Union for the Conservation of Nature (IUCN) Red List, in South Africa the African Lion population has increased 29% since 1993 and has reached the carrying capacity or over capacity by 2013.[16] Although listed as "vulnerable" in most areas, with regards to South Africa, the African lion will be listed as "least concern" on the national Red List.[16] This does not even count the nearly 7,000 captive bred lions in South Africa. As captive bred lions are not counted in population numbers for IUCN, CITES or the USFWS. According to *Baeur et al, 2015*, "South African populations do not indicate such a drastic and widespread decline… Fenced populations reveal a completely different pattern: none of them experienced a sharp decline, and many small fenced populations are increasing" [1]. Nearly all wild-lion hunting areas in South Africa are well managed and protected by fencing. *South Africa's Department of Environmental Affairs Biodiversity Management Plan for the African Lion (Panthera Leo) released in 2015* notes South Africa's lion populations have not only stabilized but are increasing – by 30 percent over the last three decades. "Because all lions in South Africa are within largely adequately fenced reserves with sufficient management budgets…" As a result, most of the threats faced by other African lions in other countries "are not relevant to lions here."[2] Other studies have shown the African Lion population in several management areas of South Africa to be at or over capacity. Because of this, South Africa's Department of Environmental Affairs recommends that lions in South Africa be downgraded on the IUCN's Red List of Threatened Species from the current classification of "Vulnerable" to a classification of "Least Concern".[2] Also according to *Riggio et al. 2013*, there are approximately 32,000-35,000 African lions on the African Continent with at least 10% being found in South Africa alone.[3]

According to the *South African's Department of Environmental Affairs Non-Detriment Findings assessment for Panthera leo (African Lion) dated 25 September 2017*, "the total national wild population (in South Africa) is estimated at approximately 2876 individuals in an estimated land area of 41,745 km2… 83% of the population is well protected... recent quantitative data suggests that lion populations are stable to increasing. This healthy wild lion population persists alongside a large captive population of approximately 7,000 lions…"[4] "The trophy hunting of captive bred lions poses no threat to the wild lion population within South Africa, and it is thought that captive lions in fact serve as a buffer to potential threats to wild lions by being the primary source of hunting trophies…"[4] "In South Africa very few wild lions are trophy hunted each year and hunting trophies are largely sourced from captive populations".[4] The report goes on and states "There is currently no major threat facing wild lions within South Africa". The report also mentions "the revenue generated through hunting contributes to the maintenance of areas where wild lion populations can continue to exist… The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat".[4] These factors alone undisputedly prove that the African Lion, Panthera leo, is

increasing in South Africa and have far surpassed the minimum numbers necessary to be listed as "least concern" in South Africa.

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?

My hunting party was filming, photographing and conducting research for ourselves and creating advertising media for the outfitter, and as part of our arrangement we were provided hunts at an unusually low amount. The hunts typically run $25,000-$45,000+. In addition to the services and media we provided I paid the Outfitter $10,000 to cover licenses and salaries of employees. food for local school and conservation projects. In addition to the services and fees I paid the outfitter, I tipped the Professional Hunter $1,000. There were two trackers and I tipped $600 and $400 each respectively. I also tipped $80-$200 to each staff (cook, maid, skinners, and driver) of the Outfitter depending on the service they provided to me. I interviewed the Professional hunter about what they do with the funds and he then showed us where a significant percentage of money paid to CMP Safaris is used to help provide a quality meal several times a week to the local school called Kgalaeo Primary School near Vorstershoop, South Africa. These meals are often the only quality meal that is provided to these children as the communities near CMP Safaris are clearly very poor and live in what I would call a one room shack. These children depend each week on lion hunters to provide wild game for their food. The money produced by lion hunting with the outfitter is used to fund this project. In addition to providing food for Kgalaeo Primary School, a portion of the trophy fee is given to the South African Predator's Association (SAPA) for conservation projects they oversee and direct in protecting and conserving the African Lion. SAPA over the past few years has proven that captive bred lions can be introduced into the wild and flourish. [5] Because I utilized CMP Safaris for my hunt a portion of the outfitter's fee is given to SAPA. SAPA uses those funds to purchase GPS collars to study wild lions to better aid conservation efforts. Money is also utilized to help other wildlife in drought stricken areas and to fight poachers of wild lions, managed wild lions and other animals. CMP Safaris and SAPA furnish food and supplies to poor income families.

It is well known in Africa that CMP Safaris, an accredited member of SAPA, provides regular meals to the children and staff at the Kgalalelo Primary School in Vorstershoop. This initiative forms part of SAPA's commitment to Social Enhancement. SAPA members all over South Africa are running similar projects to uplift local communities.[12] A percentage of the money paid to CMP Safaris is given to SAPA to help with other social enhancement projects across Africa. SAPA's Nietverdiend Social Enhancement Project utilizes time and money from other accredited outfitters to donate food, toys and stationery to Nietverdiend Primary School in the North West Province as part of SAPA's ongoing commitment to Social Enhancement.[13]

As a US Army Veteran, I unfortunately I cannot afford to pay $50,000-$100,000 to an outfitter to hunt a "wild" lion. However, I have dreamed of hunting a lion since I was a child and put in countless hours investigating the only type of hunt an average American Hunter could afford and with an outfitter that guaranteed a true African lion hunt. My extensive research lead me to SAPA accredited outfitters and ultimately CMP Safaris. I can certainly provide video of the hunt, photos, interviews, and proving this hunt was no different than hunting a "wild" lion. The lion I hunted was able to kill its own prey and had approximately 58 square miles to roam and

hunt. When I arrived at the hunting area, we spent a day tracking and watching the lion from a distance. I wanted to first observe the lions in their natural habitat and see the lion I was going to hunt. I had heard of unethical practices by non-SAPA outfitters and wanted to make sure this lion was in no way tainted, drugged or any other funny stuff. We tracked this lion for hours over several miles. I observed him through my binoculars and spotting scope. I observed him feeding on prey he had recently killed. This lion was as "wild" as any other lion I have ever watched or observed. I spoke to the owners of CMP Safaris numerous times in person at wildlife shows in the USA, on the phone and through email about my expectations, requirements and the fact if I observed any funny stuff or if the lion appeared anything but "wild" I would not be hunting. I can also tell you we covered a lot of miles on foot tracking and stalking this lion numerous times. At times it was not us hunting the lion it was the lion hunting us, as he circled around behind us and was stalking us. My hunting partner on this trip had hunted a "wild" lion several years ago and said this hunt was far more challenging and dangerous than his "wild" lion hunt.

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.

At the time of our hunt, CMP Safaris was a member of the South African Predators Association (SAPA). Through SAPA, CMP Safaris, coordinates and promotes establishing and maintaining a healthy and ethical predator breeding and hunting industry in congruence with national and international conservation principles and current national and provincial legislation. CMP Safaris limits lions exposure to humans. Their lions are initially born in an area of about 1-2 acres. As the lion matures it is moved into a 60 acre fenced in area to protect the lions from predators. Lions are raised in prides of 5-6 lions per 60 acre area and animals are introduced into the area for the lions to hunt/feed. Several weeks before a hunt lions are released into a larger area and then into an even larger area of approximately 15,000 hectares. The lion I hunted was nearly 7 years old and after he was released into the large area he hunted prey on his own. While tracking the lion we came across remains of carcasses the lion had killed, thus proving the lion I hunted was capable of surviving on his own.

As a member of SAPA, CMP Safaris also provides funding to support lions that were bred in captivity and released into the wild and are not only surviving but doing exceptionally well.[5] This research has proven that African Lions bred in captivity can be utilized to repopulate areas where lion populations have dropped in other countries. SAPA's research has clearly shown that lions bred in captivity and strategically released into the wild can and do survive. Without incentive for these breeders to breed lions, the captive bred population of lions will be euthanized because of the high costs of maintaining feeding and maintaining the lions. This will then turn the demand for hunting directly on wild lions which has already occurred in other countries of Africa.

The trackers and professional hunter from CMP safaris have been utilized by the government of South Africa to help track down poachers of wild lions and other animals as they are the absolute best lion trackers in the world. Without the money they receive from the outfitter and the tips from hunters these trackers would have to find other employment and poaching of wild lions would increase. CMP Safaris and SAPA aids in catching lion poachers and poachers of other wild animals by providing trackers and offering rewards for the capture of poachers. SAPA and

CMP Safaris also provides food and money to help starving and/or sick wild animals/lions in needed areas.

The *Government Gazette (2018)* studies show that "Hunting of wild lion on private property is limited, with less than 5% of lion hunts conducted over the 2008-2010 reporting period having targeted wild lions. The revenue generated through hunting (wild and captive-bred lions) contributes to the maintenance of areas where these (wild) lion populations can continue to exist. The economic benefits to the private sector of keeping and trading in wild lion may provide some incentive for conserving the species and its habitat".[4]

The South African Predators Association (SAPA) does not accept all lion breeders into their membership. To become a member of SAPA a ranch owner must complete an application for membership and undergo an intensive investigation and review of their facilities. There are several minimal standards that must be met in order to qualify. SAPA requires a minimum of 1,000 hectares, which is equivalent to 2,471 acres or 3.9 square miles, for hunting. I hunted with CMP Safaris and the area you hunt lions is between 4,500 acres to 37,000 acres or 58 square miles depending on the number of lions released into the area. We hiked for several hours tracking the lion I hunted. Although the lion had 58 square miles to roam and hunt it's prey, the GPS I utilized while hunting showed the lion I hunted covered an area just over 7 square miles. While observing and hunting the lion I saw numerous animals; zebra, eland, blue wildebeest, impala, gemsbok, kudu. We came on 2 animals killed recently by the lion. SAPA requires minimal human contact with lions, water sources, numerous non-domesticated prey, non-cultivated land and a lot more requirements.[8] The land I hunted in was just that.

Research on populations of lions in South Africa and other countries such as Tanzania has shown an increase in wild lion populations where captive bred lion hunting has increased. In Tanzania in 2008, there was 138 hunting lions exported, in 2010 there was 128 exported, in 2011 there was 55 exported, 2012 there was 62 exported and in 2013 only 11 were exported.[6] During this same time frame the number of captive bred lion hunts has increased. In 2015 there was only approximately 24 wild lions killed in Africa yet the number of captive bred lions increased to over 500.[6] This same Federal Register article from 2015 further states "...the captive-lion industry in South Africa may reduce the pressures of trophy hunting on the wild populations in South Africa, which is evidenced by the fact that 99 percent of lion trophies from South Africa are of Captive orgin".[6] This is irrefutable proof that the ethical hunting of captive bred lions has not only conserved the wild lion population but has also increased the population of lions in the wild. This coincides with studies referenced by the United States Fish & Wildlife Service (USFWS) that have indicated that captive bred hunting would lead to a decrease in the hunting of wild lions. Directly due to captive bred hunting, the IUCN and CITES research has shown over the last 21-24 years there has been a 29% increase in lion population in South Africa and South Africa is at or over the number of lions that can be sustained in their lands. The USFWS in 2016 reported that there is no endangerment of lions in South Africa and they are not currently endanger of extinction.[10]

Despite what some environmentalists would like many to believe, the fact is research has proven that hunting of captive bred lions has enhanced and benefited the wild lion population.

According to the *Federal Register (2015)*, Research on populations of lions in South Africa and other countries such as Tanzania has shown an increase in wild lion populations where and when captive bred lion hunting has increased.[6] Specifically in Tanzania in 2008, there was 138 hunting lions exported, in 2010 there was 128 exported, in 2011 there was 55 exported, 2012 there was 62 exported and in 2013 only 11 were exported. During this same time frame the number of captive bred lion hunts had increased. In 2015 there was only approximately 24 wild lions killed in Africa yet the number of captive bred lions increased to over 500. This is irrefutable proof that the ethical hunting of captive bred lions has not only conserved the wild lion population but has also increased the population of wild lions. Those countries who do not have captive bred lion hunting have seen a decrease in lion populations. Because of captive bred hunting, the IUCN and CITES research has shown over the last 21-24 years there has been a 29% increase in lion population and South Africa is at or over the number of lions that can be sustained in their lands. In addition the article mentioned above in the *Federal Register* also states "while the captive-lion industry may not be contributing to the conservation of the species in the wild via reintroduction, the captive lion industry in South Africa may reduce the pressures of trophy hunting on the wild populations in South Africa".[6] This has been evidenced by the fact that 99% of the lion trophies from South Africa are of captive bred origin.[6] And South Africa has seen the largest increase in wild lion populations to the point that in most areas the lions are over capacity. In the United States, the USFWS "culls" the bison herd in Yellowstone when the number of bison goes over the capacity of the park.

The purpose of the Endangered Species Act (ESA) is to protect and recover imperiled species and the ecosystems upon which they depend. In other words the ESA primary goal is the survival and recovery of a species within its native ecosystem. By the ESA's own admission the Act is not well suited to consideration of animals (specimens) bred, raised or held in captivity and unfortunately captive bred lions are not eligible for separate consideration for listing on the endangered list.[6, 9] In fact the approximately 7,000 captive bred lions in South Africa and thousands more in other areas of Africa and around the world are not counted in the total population number of African Lions. Thus the African lion population numbers quoted in studies and research and the IUCN Red list do not include the captive bred population. If the population of captive bred lions was included, the African lion Panthera leo melanochaita which is now classified as Vulnerable by the IUCN would not even be listed as least concern in South Africa as their wild lion populations are at or over capacity in most areas[9]. Furthermore, according to the best available data and the IUCN, the current population of African lions is between 23,000-39,000 lions (not counting captive bred which if included would bring the total to 31,000-47,000). No study includes the population of over 7,000 captive bred lions in their numbers. The authors of the research failure to include all lions is an obvious attempt to deceive the public, the IUCN, the USFWS and others in an attempt to have the lions protected by the Endangered Species Act when the facts are the African lion is at or over capacity in South Africa. Former Director of the USFWS, Dan Ashe and the USFWS has said "The subspecies of P. l. Melanochaita likely numbers between 17,000-19,000 and is found across southern and eastern Africa. The USFWS determined that this subspecies is less vulnerable and is not currently in danger of extinction".[10] In the same article the USFWS then says lions are decreasing in other areas of Africa and because of this are listed under the Endangered Species Act, despite the mountain of evidence that clearly shows this is far from the case in Southern Africa and Eastern Africa.[10] The USFWS further stated that "Many of the increasing southern African (lion) populations are in small, fenced and intensely managed areas that have already

reached carrying capacity".[11] It is well known that the roughly 5,000 American Bison in Yellowstone National Park are frequently at or over capacity for the park. To alleviate this, the USFWS has them rounded up and slaughtered. In 2017 the USFWS killed roughly 1,200 Bison. The reason given by the USFWS is to protect the species, the land from over grazing and other wildlife. Lions are much more dangerous than bison and kill or injure far more people and livestock. According to the USWFS lion population numbers in South Africa are at over carrying capacity. Thus hunting lions in South Africa both wild born and captive born should be hunted to protect the ecosystem, the lion, other wildlife, domestic animals and most importantly protect people.

Studies and the literature have proven that the African Lion's gestational period is approximately 106 days. Lions have 2-6 cubs per litter. And a lioness is polyestrous and will come into heat to be impregnated at least 4-5 times per year until she is pregnant. Research has absolutely proven that orphaned cubs will be adopted by other lions if the mother dies or abandons the cub. This fact alone is one of the biggest reasons that captive bred cubs should and could be introduced into wild lion prides. By allowing the importation of African lions bred in captivity from reputable breeders such as those certified by South African Predators Association, the USFWS ensures the continued growth of the captive bred population which may be utilized to enhance the wild lion prides and establish new healthy prides. Captive bred lion cubs are healthier than wild lions as they are vaccinated against disease, which is one of the main threats to lion cub's survival outside of predators. Without allowing import of captive bred lions, the USFWS will be directly causing the death of thousands of captive bred lions and hunters will return to hunting wild lions. This is already occurring in Africa since the lion import ban, as maintaining captive bred lions is extremely expensive. If there is no reason for breeders to raise lions than sadly the breeders will be forced to euthanize them simply because the cost to maintain them will be prohibitive. Breeders such as CMP Safaris are extremely cautious not to allow human imprint on their lions and to maintain a "wild" lion temperament. Currently, the USFWS says a lion is wild if it is born in the wild even if raised in captivity and called captive bred if born while in captivity even if raised in the wild the lion will still be called captive bred. *Abell et al (2013)* state that lion cubs born in captive bred prides should be utilized for reintroduction.[15] The only way this is going to happen is if the USFWS allows the import of captive bred trophies. Otherwise, there will be a drastic reduction of captive bred lions due to euthanization because the breeders will not be able to afford raising them. This is already happening in Africa. CMP Safaris informed me have thousands of lions that had been killed simply because of Former Director Ashe's decision not to allow import unless we can show a conservation effect.

It is well known that the primary reason for the African Lion to be listed as vulnerable in South Africa when science has proven they should be listed as "least concern" in South Africa is due to philosophical objections to hunting in general and not research. Many do not like the idea of lion hunting, yet have no problem with others slaughtering thousands of cattle or pigs each year that are raised in a pen or small fenced area. *According to Lindsey et al (2012)* "the primary benefit associated with captive-bred lion hunting is that it reduces hunting pressure on wild lion populations, and contributes to the South African economy…".[7] Even in the Federal Register, the USFWS stated "In South Africa, 99 percent of the lion trophies are captive bred, and, therefore, were not the result of removing lions from the wild".[6] This statement alone proves that the hunting of captive-bred lions is conserving the wild lion population. Allowing the import of lions

from SAPA accredited outfitters, such as CMP Safaris, definitely will conserve the wild lion population. Although extremely unlikely, if wild lions were to become extinct in areas, having a large captive bred lion population can be utilized to re-introduce lions into those areas.

The reintroduction of captive bred animals and captured animals has saved numerous species of animals. Just in the last 20 years wolves were reintroduced into the Yellowstone and surrounding ecosystem. The wolves released were of differing ages including pups as young as one year old and they have survived. Many other animals across the world have been restored by reintroducing their species from captive bred populations such as rhinos, cheetahs, lions and other wild species. Across the world it is the trophy hunters, primarily American Hunters, whose hunting and donations has saved numerous animals from extinction. Many environmentalists and conservationist want hunting stopped but the vast majority of them do not contribute time and money to restoring wildlife. The primary reason for the decrease in lion populations outside southern and eastern Africa is loss of available land due to global human population increases causing pressure on wildlife and habitat.[14] *Abell et al (2013)* in their research indicated "Captive bred animals are a logical source for reintroduction programs in instances where wild populations are precluded from translocation and reintroduction programs due to genetic incompatibility and disease prevalence. Captive populations can be secure and free from disease. Captive lions can be easily bred in sufficient numbers and in an environment where the species can easily acclimatize to release". [14] Joy and George Adamson released 17 hand reared lions (captive bred) into the wild using a soft-release strategy has been shown to be successful.[15] *Abell et al (2013)* indicated a benefit of using captive bred lions is reproduction rates, genetics and disease can be controlled. [15]

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SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 54031

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 17 / 06 / 2017 Terminated 19 / 06 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)		Free State (FS)		Gauteng (GP)		Limpopo Province (LP)		North West (NW)	X	Mpumalanga (MPA)		Western Cape (WC)		Eastern Cape (EC)		Northern Cape (NC)	

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: GG VAN SCHALKWYK

Business Address: FARM AURORA

VORSTERSKOOP

Code: 8615

ID No: 830917 5044 087

PH Permit No: CPE/10/2016 NW

Date: 19/06/2017 Signature:

CLIENT

Name: BRIAN KEITH FIFE

Permanent Postal Address: [redacted]

NEVADA Code:

Country: LAS VEGAS Tel/Fax:

Passport No: [redacted]

Email:

Date: 19/6/2017 Signature:

HUNTING OUTFITTER

Name: GG VAN SCHALKWYK

Business Address: FARM AURORA

VORSTERSKOOP Code: 8615

I.D. No: 830917 5044 087

Tel No: 083-3604234 Fax No:

HO Permit No: 035/10/2016 NW

Date: 19/6/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
FARM	DR. OPSM	GG VAN SCHALKWYK	CPE6-33	18/6	WC-N	1		✓	FULL MOUNT
AURORA		AURORA			Leopard	1		✓	Skull, Hide, Claws
V185/830917		VORSTERSKOOP							
5044 087		8615							

Address to which trophies are to be sent: MCCROCKLAC TAXIDERMY

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies Client: Original 1st Copy White Forward to Nature Conservation Authority where hunt took place

Hunting Outfitter: 2nd Copy Blue Retain for a period of three years

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards the conservation, protection and management of

ORDINARY PERMIT

PERMIT NUMBER: O 10633

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME OF ISSUING AUTHORITY	
NAME	READ
ADDRESS	Mini Canno Offices
ADDRESS	Kholopo & Wood St
PROVINCE	North-West

DETAILS OF PERMIT HOLDER

NAME	Brian Keith	ID NO.	(b) (6)
SURNAME	FIFE	PASSPORT NO.	
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	(b) (6)		
ADDRESS	Las Vegas, NV		SAME
ADDRESS			
TOWN			
POSTAL CODE	(b) (6)		
PROVINCE	USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	GC Van Schalkwyk
NAME AND SURNAME : RESPONSIBLE PERSON	GC Van Schalkwyk
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Aurora
PHYSICAL ADDRESS OF FACILITY	Norsteinshoop
DISTRICT	Dr RSM
PROVINCE	North-West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 10/06/2017 at 06h00 and hunt from 14/06/2017 at 06h00. Hunt one (1) captive bred male lion on the farm Aurora - Camp A and transport the empty to: Mantalalo Taxidermy, Bainsvlei - Bloemfontein

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	BK FIFE
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	GC Van Schalkwyk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	GC Van Schalkwyk
WEAPON AND METHOD OF HUNTING	416 Rigby, Bolt & Stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	N/A
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 10/06/2017	TO:	09/07/2017
RECEIPT NUMBER	R1150,00 EFT		
SIGNATURE OF ISSUING OFFICER:	DEPT. OF RURAL, ENVIRONMENTAL & AGRICULTURAL DEVELOPMENT ... NORTH-WEST DISTRICT	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	12-04-2017		

re
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

Ordinary Permit No: O 10633

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises the hunting of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)

No hunting with dogs is allowed.
Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. **A Nature Conservation Official must be present during the release and hunting of the lion.** **Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity.** Tell: 053 928 0656 or \071 889 7867\082 446 1816
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.

Signature of Issuing Officer: _____ Date: 12/04/2017

Signature of hunter: _____ Date: 19/06/2017

Signature of land owner: _____ Date: 19/06/2017

Signature of PH: _____ Date: 19/06/2017

DEPT OF RURAL, ENVIRONMENTAL & AGRICULTURAL DEVELOPMENT
DISTRICT
12 -04- 2017
P.O. BOX 112 VRYBURG 8600
NORTH WEST PROVINCE

re

Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 10633

(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the **transport** of the **Trophy or parts** of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling, possession, exporting, importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

DEPT. OF RURAL, ENVIRONMENT & AGRICULTURAL DEVELOPMENT
DR RUTH SEGOMOTSI MOMPATI DISTRICT
12 -04- 2017
P.O. BOX 112 VRYBURG 8600
NORTH WEST PROVINCE

The DEDECT

Department:
Economic Development, Environment, Conservation and Tourism
North West Provincial Government
Republic of South Africa

OK Building
Market Street
P.O Box 112,
Vryburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 010633

Name of Hunter, Home address, Tel Number and Passport / ID number
BRIAN KEITH FIFE
(b) (6) LAS VEGAS, NV (b) (6) USA

Outfitter: Name & North West permit number
GG VAN SCHALKWYK: HH-035/10/2016 NW

Prof Hunters: Name & North West permit number of the two (2) PH's conducting the hunt
GG VAN SCHALKWYK: PH - 076/10/2016 NW

Description of animal Sex, Age, Origin (Docs e.g, Transport, Keeping & Import) and exact date and time released
1 X MALE LION
Release: 10/6/2017

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 01033

Details of Hunting area: Name, Size and Ownership
CAMP B
FARM AURORA, VOORSTEBOSHOOP

I hereby acknowledge that I am fully aware of the following:

1. This lion was bred in captivity
2. That this animal will be hunted in a confined area
3. That this lion was released in the hunting area a minimum of 96 hours prior to this hunt
4. That this hunt may not be recorded as a wild or free roaming hunt

Signature of Client (Hunter) — Date: 19/6/2017

Signature of Professional Hunter No 1 — Date: 19/6/2017

Signature of Professional Hunter no 2 — Date:

Signature of Hunting Outfitter — Date: 19/6/2017

Signature of Landowner — Date: 19/6/2017

RCVD 9-P 6 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires Rev 08/31/2020

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Zeliff	Peter	Herbert	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Batavia	NY	(b) (6)		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. 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.

Peter H Zeliff — 8/31/2018

Signature of applicant/Principal Officer 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: 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:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) 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

(4) 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.

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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 regular mail through the U.S. Postal Service.

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

Peter Zeliff (b) (6) [redacted]

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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera leo.

   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:

   b. Date wildlife is to be hunted:

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

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:
   Republic of South Africa (RSA)
   Kalahari oryx Private Game Reserve

   b. Date wildlife was hunted: 20/08/2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
   Chapunga SAfaris

   c. 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]:
   Kalahari oryx Private Game Reserve

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).

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: Natasha Lotter
Business Name: Swift DiP
Address: Po Box 1333
City: Thabazimbi
State/Province: Limpopo Province
Country, Postal Code: republic of South Africa, 0380

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? yes -
   Free Range Extensive Certificate as per RSA Government - DEA Dated 16/02/2017.

   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?
   Could be obtained from the landowner.
   Kalahari Oryx Private Nature reserve
   Contact details
   Email - johan@kalahari-oryx.com.

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: Paul HS _____ Date: 8/31/2018

    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.

All international shipment(s) must be imported 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).

environmental affairs
Department
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 PRETORIA 0001 437 Steve Biko Road Arcadia PRETORA Tel (+27 86) 111 2468

Enquiries: Mr Mpho Tjiane
Tel: (012) 399 9596 Email: MTjiane@environment.gov.za

Department of Environmental Affairs and Nature Conservation
Private Bag X6102
KIMBERLY
8301

Fax: (053) 807 7367

Dear Mr Jacobs

CONFIRMATION OF KALAHARI ORXY AS A FACILITY IN POSSESSION OF WILD *PANTHERA LEO* (LION) POPULATION

The South African Government has in the 2016 annual year submitted information on the enhancement of the hunting of the wild South African lion populations to conservation of the species and upon a thorough assessment, the United States Fish and Wildlife Service has approved the enhancement finding on the hunting of the South African populations of Wild lions allowing for the importation of trophies from wild sourced lions.

In order to ensure that integrity of the hunting farms that possesses wild lions, an assessment criteria was developed which looks at aspects including: the area is sufficient to sustain a single social unit, the populations have a viable social structure, they are breeding in area in which they are roaming, the animals are not fed or receive any supplementary feeding and that the populations are from the wild.

In light of the above, the South African Government would like to confirm that Kalahari Oryx Private Game Reserve situated in the Northern Cape has been recommended as a facility that is possession of wild lion populations that are viable for hunting purposes.

Hope you find the above in order.

Yours sincerely

Ms Nosipho Ngcaba
Director-General
Department of Environmental Affairs
Letter signed by: Mpho Tjiane
Designation: Deputy Director CITES
Date: 16/02/17

ODB.Number: 1414/2018 Permit No: FAUNA 0643/2018 Application ID: 37645

Question 7

Issued in terms of the provisions of:
National Environmental Management: Biodiversity Act 10 of 2004

Biodiversity

Northern Cape Province

Integrated Competence

Permit

Ordinary

Hunting

Lion Hunting

Issued in terms of the provisions of:
Northern Cape Nature Conservation Act, 9 of 2009

SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND PERMIT CONDITIONS AS PER ADDENDUM 1 AND PAGES ATTACHED

Authorising Entity / Institute / Company

Peter Herbert Zeliff - ID or Passpor(b) (6) Farm name: - Physical Address: (b) (6) Batavia - International - NY (b) (6)

Postal address: (b) (6) Batavia, NY (b) (6) USA

Contact details: Office: - Home: - Cell: - Fax: - E-mail:

Region in which restricted activity will take place

ZF Mgcawu (Siyanda) - Northern Cape Province

Address / Place / Fixed Property where restricted activity will be carried out, conducted or take place

Kalahari Oryx Game Farm, Upington, Siyanda, Northern Cape Province

Digital signature of verifier

MD Smit

Digitally signed by MD Smit
DN: C=ZA, E=mdsmit@nwpg.gov.za, O=Department of Environment and Nature Conservation, OU=Permit Administration, CN=MD Smit
Location: Kimberley
Reason: This document has been verified as correct according to departmental legislation, policy and prescripts and I attest to the accuracy and integrity of this document
Contact Info: 0538077485
Date: 2018.08.09 12:08:51 +02'00'

Issuing authority

VALIDITY PERIOD

FROM 18/08/2018 TO 18/09/2018

Stamp if applicable

HUNTED

Permit holder / Dealer

Signature of Issuing Authority

8/8/2018

Signature of Permit Holder

20/08/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 *(Cal) Tel: 027-341 1779 Fax: 027-341 1718* *(De Aar) Tel: 053-6310 601 Fax: 053-6310 343*

(Kuruman) Tel: 053-712 8702 Fax: 053-712 8836 *(Upington) Tel: 054-3327885 Fax: 054-3311155*

ADDENDUM 1

PRESCRIBED FEES

The prescribed fees paid for the issuing of this document shall not be refunded

Tariff: All unspecified - Amount currently owed: R50 - Debit amount: R50 on 12/07/2018 with receipt number: Kalahari Oryx - 1841628679

SPECIES AND NUMBERS PERMITTED

Live, Panthera leo, Lion, Leeu - 1 (One) -Species sex: Male,

STANDARD RESTRICTED ACTIVITIES AND METHODS PERMITTED

Hunting, catching, capturing and killing
a) as per standard and special permit conditions
b) as per any other additional restricted activities specifiend

SPECIAL RESTRICTED ACTIVITIES AND METHODS PERMITTED

None

ADDITIONAL RESTRICTED ACTIVITIES AND METHODS PERMITTED

None - by using the following prohibited method and/or instrument namely: None

GENERAL PERMIT CONDITIONS APPLICABLE

1) This permit is not transferable to any individual person or any other legal identity.

2) Any alterations to this permit shall immediately render it invalid.

3) This permit is deemed valid only:
a) in the original format as issued by the Director.

b) for the period as specified on the permit.

c) once the signature of the holder thereof has been endorsed thereon in ink.

4) The Director reserves the right to amend, withhold, withdraw or cancel any permit at any time.

5) This permit shall lapse / be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.

6) This permit, unless otherwise stated, is valid only within the boundaries of the Northern Cape Province and then specifically only for the property as specified on the permit.

7) This permit does not grant the permit holder automatic access to any Protected area, National Park, Provincial Nature Reserve or privately owned land. Any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion must also be adhered to.

8) The permit holder must at all times while performing any restricted activity have the permit and all relevant documentation in his / her possession.

9) Permits must be made available upon request of any authorized person. This person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection.

10) If applicable, the permit holder must within 21 days after performing the restricted activity furnish the Director with a written return as prescribed, with feedback on the results of the activity conducted.

11) If applicable, the permit holder shall apply for the renewal of the permit to the Director, on the appropriate application form, at least 3 months prior to the expiry date thereof.

12) The holder of this permit shall return the original to The Director: Permit Administration, Private Bag X6102, Kimberley, 8300, within

Signature of Issuing Authority

5/5/2018

Signature of Permit Holder

20/08/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 *(Cal) Tel: 027-341 1779 Fax: 027-341 1718* *(De Aar) Tel: 053-6310 601 Fax: 053-6310 343*

(Upington) Tel: 054-3322885 Fax: 054-3311155

ADDENDUM 1

fourteen days from the date of expiry thereof.

13) No new permit applications will be processed prior to the return of the original permit, once it has been used or once it has expired.

14) This permit is subject to the provisions of any law in force, during the period of validity of the permit, in respect of the specific area to which the permit applies.

15) This permit is subject to any applicable norms and standards in existence at the time of issuance of this permit.

16) It is the permit holder's responsibility to obtain information on any other legislation or changes thereto and any specifications or permit requirement that may be needed or required from any other department / organization / institute, for any activity as authorized by this permit.

17) It should be noted that any transgression, failure to render the required reports and or the return of the original permit, can jeopardize any future applications by the permit holder.

18) If the holder of this permit contravenes or fails to comply with any permit condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

STANDARD PERMIT CONDITIONS APPLICABLE

HUNTING

1) The permit holder may NOT use:

a) a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities.

b) a fire-arm having a barrel caliber of less than 9.525 mm (.375 of an inch) to hunt any buffalo, elephant, lion, leopard, rhinoceros or hippopotamus unless authorised in the restricted activities.

2) When a hunter kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed.

3) This permit can only be used and consider being valid after:

a) the landowner has provided written permission to the hunter for the hunt.

b) the landowner has provided written permission to the hunter / client to remove the carcass.

4) Unless authorized by a valid Game Farm Permit, authorised in the restricted activities or authorised by another permit to this effect, no person may hunt, capture or catch any wild animal-
a) by means of fire;
b) by means of poison;
c) by means of aircraft;
d) during the night
e) with the aid of an artificial light, floodlight or spotlight;
f) by means of any trap
g) by means of any snare;
h) by means of a spear, kierie, stick or any similar device;
i) by means of a blowpipe or similar device;
j) by means of an air gun;
k)by means of a fire-arm which discharges a rim-fire cartridge of a 5.6mm (.22 inch) caliber or smaller caliber;
l)by means of a fire-arm which discharges more than two shots without being manually reloaded;
m) by means of a shotgun, except for the hunting of birds;
n)by means of a bow-and-arrow, cross-bow or similar device discharging an arrow or dart;
o) by means of a set gun or any similar device;
p)by means of darting or any device which injects an intoxicating or a narcotic agent or poison into such animal;
q)which is kept in captivity, confined to a cage, in an enclosure or trapped against a fence where the animal does not have a fair chance of evading the hunter;
r)which is under the influence of any tranquilizing or narcotic immobilizing or similar agent;
s)by the use of a dog, except for the hunting, flushing, pointing or retrieving of birds, or for the purpose of following or searching for any such

Signature of Issuing Authority

Signature of Permit Holder

8/8/2018

20/08/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 *(Cal) Tel: 027-341 1779 Fax: 027-341 1718* *(De Aar) Tel: 053-6310 601 Fax: 053-6310 343*

(Kuruman) Tel: 053-712 8702 Fax: 053-712 0936 *(Upington) Tel: 054-3322885 Fax: 054-3311155*

ADDENDUM 1

animal which has been wounded;
t)in the case of birds in or upon any aquatic systems, by the use of a boat for the purpose of chasing or killing such birds;
u)by means of setting a set trap within 10 meters from a common boundary;
v)by luring by means of a simulation or recording of the natural sound made by an animal or by means of bait or scent or any other induced luring method;
w)in an area smaller than the set standard of 400 hectares, as determined by the Director from time to time;
x)any other device of which the use would result in injuring or killing an animal in a way which is not humane;
y) by means of any other animal or bird of prey for the sport of falconry; or
z) by means of a firearm fitted with a silencer or similar noise-reduction device;

provided that in respect of the hunting of : -

i)rodents, excluding porcupines and springhare, the provisions of paragraphs (b), (d), (e), (f), (g), (m), (q) or
ii) any wild animal by a registered veterinary surgeon in the practice of his or her profession, the provisions of paragraph (p) and (q), or
iii)damage-causing animals as specified in Schedule 4, the provisions of paragraphs (d), (e), (f), (g), (p) (q) (r) and (v) shall not apply.

SPECIAL PERMIT CONDITIONS APPLICABLE

DANGEROUS GAME HUNTING

The permit holder must ensure that:

1) a fire-arm having a barrel caliber of at least 9.525 mm (.375 of an inch) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus.

2) the hunter is escorted by two Northern Cape Province registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals.

3) no prohibited hunting method is used to hunt an animal, unless approved by this permit.

4) the animal which is hunted, is not a "put and take animal" and such animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof.

7) if the hunter belongs to any hunting organisation, the hunt is conducted in an approved hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity.

8) no hunting of a lion takes place unless a representative of the relevant conservation department is present. (Note: arrangement can be made with Mr. Wessel Jacobs at 082 411 7179 or at 053 8077482 to be present during the hunt).

9) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this regard.

LION HUNTING

The permit holder must ensure that:

1) no tame or captive bred large predator is hunted.

2) no large predator is hunted which is under the influence of a tranquiliser, narcotic, immobilising or similar agent.

3) no baiting or any luring of a large predator take place.

4) no hunting of a large predator take place close to or when pressed against a fence or in any other a situation from which it has no escape.

ADDITIONAL PERMIT CONDITIONS APPLICABLE

1) Other people included on this permit -

a) JvW Hartzenberg - ID: 6901135055088 (PH)
b) MW Jacobs - ID: 6003045027081 (DENC)

Signature of Issuing Authority

5/8/2018

Signature of Permit Holder

20/8/2018
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

(Kuruman) Tel: 053-712 0702 Fax: 053-712 0926 Alex Tel: 054 3321885 Fax: 054 3344455

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 69382

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 19 / 08 / 2018 Terminated 21 / 03 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
								X

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: JN. Raubenheimer

Business Address: Kruisrivier Singel no 46, Durbanville, Cape Town

Code: 7550

ID No: 8901095060084

PH Permit No: 076/2016

Date: 20/08/2018 Signature:

CLIENT

Name: Peter Herbert Zelif

Permanent Postal Address: [redacted]

Batavia, NY Code: [redacted]

Country: USA Tel/Fax:

Passport No: [redacted]

Email:

Date: 20/08/2018 Signature:

HUNTING OUTFITTER X

Name: JVW Hartzenberg

Business Address: 1 Westerdal Srd.

Durbanville, Cape Town Code: 7550

I.D. No: 8901095060084

Tel No: 082 554 2304 Fax No:

HO Permit No: 008/2017

Date: 20/08/2018 Signature: JVW. Hartzenberg

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Kalahari Oryx	Carolonia	Oryx Management Services	0663/2018	20/08	Lion	1		x	Full Cape Skull + Teeth,
			133/2014	20/08	Steenbok	1		x	Full Cape Skull
LION HUNTED IN MY PRESENCE.						20/08/2018.			

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies:

Client	Original	White	
	1st Copy	Pink	Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter	2nd Copy	Blue	Retain for a period of three years
Taxidermist	3rd Copy	Green	Taxidermist
Professional Hunter	Last Copy	Yellow	Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

ODB Number: 162/2014 Permit No: FAUNA 133/2014 Application ID: 21333

Biodiversity

Northern Cape Province

Integrated Competence

Permit

Standing

Game Farm / CAE

Game Farm - Plains Game, Lion and Rhino

Issued in terms of the provisions of:
National Environmental Management: Biodiversity Act 10 of 2004

Issued in terms of the provisions of:
Northern Cape Nature Conservation Act, 9 of 2009

SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND PERMIT CONDITIONS AS PER ADDENDUM 1 AND PAGES ATTACHED

Authorising Entity / Institute / Company

Oryx Management Services (Pty). Ltd.

Johan Frederik Maritz - ID or Passport (b) (6) - Farm name: - Physical Address: Tweepoort - Upington - Northern Cape Province - 8800

Postal address: PO Box 293, Upington, Northern Cape, 8800

Contact details: Office: - Home: - Cell: +27834069729 - Fax: - E-mail: johan@kalahari-oryx.com

Game Farm

Kalahari Oryx

Hectares

86,948.00

In the Division -

Siyanda - Northern Cape Province

Of which the description of boundaries is as follows

The property known as Kalahari Oryx the boundaries of which are described in Deed of Transfer No. T. 1860/2001, 1754/2001, 3661/1991, 3516/2008, 2253/2011, 2506/2009, 3733/2000, 571/2001, 1937/2001 & 2681/2008

Fence classification

1A (2,4m with mesh)

Digital signature of verifier

CScholtz

Digitally signed by CScholtz
DN: C=ZA, E=cscholtz@ncpg.gov.za, O=Department of Environment and Nature Conservation, OU=Permit Administration, CN=CScholtz
Location: Kimberley
Reason: This document has been verified as correct according to departmental legislation, policies and prescripts and I attest to the accuracy and integrity of this document
Contact Info: +27538077451
Date: 2014.04.03 10:29:12+02'00'

Issuing authority

VALIDITY PERIOD

FROM 03/04/2014 TO 03/04/2019

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

PRESCRIBED FEES

The prescribed fees paid for the issuing of this document shall not be refunded

Tariff: Game Farm Renewal - Amount currently owed: R50 - Debit amount: R50 on 24/01/2014 with receipt number: Kalahari Oryx CAE - 416532413

SPECIES AND NUMBERS PERMITTED

Black Rhinoceros, Swartrenoster, Diceros bicornis bicornis

Black Wildebeest, Swartwildebees, Connochaetes gnou

Blesbuck, Blesbok, Damaliscus pygargus phillipsi

Blue Wildebeest, Blouwildebees, Connochaetes taurinus

Bontebok, Bontebok, Damaliscus pygargus pygargus

Buffalo, Buffel, Syncerus caffer

Burchell's Zebra, Bontsebra, Equus burchellii

Common Duiker, Gewone duiker, Sylvicapra grimmia

Eland, Eland, Taurotragus oryx oryx

Gemsbuck, Gemsbok, Oryx gazella

Giraffe, Kameelperd, Giraffa camelopardalis

Hartmann's Mountain Zebra, Hartmannse bergsebra, Equus zebra hartmannae

Impala, Rooibok, Aepyceros melampus melampus

Klipspringer, Klipspringer, Oreotragus oreotragus

Kudu, Koedoe, Tragelaphus strepsiceros

Lion, Leeu, Panthera leo

Mountain Reedbuck, Rooiribbok, Redunca fulvorufula

Nyala, Njala, Tragelaphus angasii

Ostrich, Volstruis, Struthio camelus

Red Hartebeest, Rooihartebees, Alcelaphus buselaphus

Roan Antelope, Bastergemsbok, Hippotragus equinus equinus

Sable, Swartwitpens, Hippotragus niger niger

Springbok, Springbok, Antidorcas marsupialis

Steenbok, Steenbok, Raphicerus campestris

Tsessebe, Sassaby, Damaliscus lunatus

Warthog, Vlakvark, Phacochoerus africanus

Waterbuck, Waterbok, Kobus ellipsiprymnus

White Rhinoceros, Witrenoster, Ceratotherium simum simum

RESTRICTED ACTIVITIES AND METHODS PERMITTED

Hunting, catching, capturing and killing - by using the following prohibited method and/or instrument namely: as stipulated in point 2 of the "GAME FARM CONDITIONS" in the standard conditions

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

Having in possession or exercising physical control over any DEAD specimen - by using the following prohibited method and/or instrument namely: None

Conveying, moving or otherwise translocating a DEAD specimen - by using the following prohibited method and/or instrument namely: None

Process, prepare, cure, tan or treat in any manner whatsoever, to manufacture any article from such carcass or to mount or exhibit any article of such carcass - by using the following prohibited method and/or instrument namely: None

Selling or otherwise trading in, buying, receiving, giving, donating or accepting as a gift, or in any way acquiring or disposing of any specimen - by using the following prohibited method and/or instrument namely: None

GENERAL PERMIT CONDITIONS APPLICABLE

1) This permit is not transferable to any individual person or any other legal identity.

2) Any alterations to this permit shall immediately render it invalid.

3) This permit is deemed valid only:
a) in the original format as issued by the Director.

b) for the period as specified on the permit.

c) once the signature of the holder thereof has been endorsed thereon in ink.

4) The Director reserves the right to amend, withhold, withdraw or cancel any permit at any time.

5) This permit shall lapse / be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.

6) This permit, unless otherwise stated, is valid only within the boundaries of the Northern Cape Province and then specifically only for the property as specified on the permit.

7) This permit does not grant the permit holder automatic access to any Protected area, National Park, Provincial Nature Reserve or privately owned land. Any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion must also be adhered to.

8) The permit holder must at all times while performing any restricted activity have the permit and all relevant documentation in his / her possession.

9) Permits must be made available upon request of any authorized person. This person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection.

10) If applicable, the permit holder must within 21 days after performing the restricted activity furnish the Director with a written return as prescribed, with feedback on the results of the activity conducted.

11) If applicable, the permit holder shall apply for the renewal of the permit to the Director, on the appropriate application form, at least 3 months prior to the expiry date thereof.

12) The holder of this permit shall return the original to The Director: Permit Administration, Private Bag X6102, Kimberley, 8300, within fourteen days from the date of expiry thereof.

13) No new permit applications will be processed prior to the return of the original permit, once it has been used or once it has expired.

14) This permit is subject to the provisions of any law in force, during the period of validity of the permit, in respect of the specific area to which the permit applies.

15) This permit is subject to any applicable norms and standards in existence at the time of issuance of this permit.

16) It is the permit holder's responsibility to obtain information on any other legislation or changes thereto and any specifications or permit requirement that may be needed or required from any other department / organization / institute, for any activity as authorized by this permit.

17) It should be noted that any transgression, failure to render the required reports and or the return of the original permit, can jeopardize any future applications by the permit holder.

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

18) If the holder of this permit contravenes or fails to comply with any permit condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

STANDARD PERMIT CONDITIONS APPLICABLE

HUNTING

1.□The permit holder may not allow the use of:

a)□a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck.

b)□a fire-arm having a barrel caliber of less than 9.525 mm (.375 of an inch) to hunt any buffalo, elephant, lion, leopard, rhinoceros or hippopotamus.

2. When a hunter kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed.

3.□This permit can only be used and consider being valid after:

a)□The landowner has provided written permission to the hunter for the hunt.

b)□The landowner has provided written permission to the hunter / client to remove the carcass.

4.□Unless authorized in the game farm conditions hereunder or by a special permit to use prohibited hunting methods and / or instruments, the permit holder may not hunt, capture or catch any wild animal
a)□ by means of fire;
b)□ by means of poison;
c)□ by means of aircraft;
d)□ during the night
e)□ with the aid of an artificial light, floodlight or spotlight;
f)□ by means of any trap
g)□ by means of any snare;
h)□ by means of a spear, kierrie, stick or any similar device;
i)□ by means of a blowpipe or similar device;
j)□ by means of an air gun;
k)□by means of a fire-arm which discharges a rim-fire cartridge of a 5.6mm (.22 inch) caliber or smaller caliber;□
l)□by means of a fire-arm which discharges more than two shots without being manually reloaded;
m)□ by means of a shotgun, except for the hunting of birds;
n)□by means of a bow-and-arrow , cross-bow or similar device discharging an arrow or dart;
o)□ by means of a set gun or any similar device;
p)□by means of darting or any device which injects an intoxicating or a narcotic agent or poison into such animal;
q)□which is kept in captivity, confined to a cage, in an enclosure or trapped against a fence where the animal does not have a fair chance of evading the hunter;
r)□which is under the influence of any tranquilizing or narcotic immobilizing or similar agent;
s)□by the use of a dog, except for the hunting, flushing, pointing or retrieving of birds, or for the purpose of following or searching for any such animal which has been wounded;
t)□in the case of birds in or upon any aquatic systems, by the use of a boat for the purpose of chasing or killing such birds;
u)□by means of setting a set trap within 10 meters from a common boundary;
v)□by luring by means of a simulation or recording of the natural sound made by an animal or by means of bait or scent or any other induced luring method;
w)□in an area smaller than the set standard of 400 hectares, as determined by the Director from time to time;
x)□any other device of which the use would result in injuring or killing an animal in a way which is not humane;
y)□ by means of any other animal or bird of prey for the sport of falconry; or
z)□ by means of a firearm fitted with a silencer or similar noise-reduction device;

provided that in respect of the hunting of : -

i)□rodents, excluding porcupines and springhare, the provisions of paragraphs (b), (d), (e), (f), (g), (m), (q) or
ii) any wild animal by a registered veterinary surgeon in the practice of his or her profession, the provisions of paragraph (p) and (q), or
iii)□damage-causing animals as specified in Schedule 4, the provisions of paragraphs (d), (e), (f), (g), (p) (q) (r) and (v) shall not apply.

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

GAME FARM CONDITIONS

1)□Any restricted activity, instrument and methods as authorized by the "Game Farm Standing Permit" does not apply to any listed CITES 1 species and / or species listed as Endangered according to the Schedules of the Nature and Environmental Conservation Ordinance 19 of 1974.

2)□Ordinance 19/1974 Section 36(a) – Rights of the landowner is hereby specified as follows:

a)□In accordance with Section 33(1) en (2) of Ordinance 19/1974, a motor vehicle or aircraft may be used for the hunting or capturing of a wild animal for management purposes.
□
b)□In accordance with the stipulations of Sections 29 of Ordinance 19/1974, the following prohibited hunting methods may be used namely:
i.□Hunting, culling or capturing with the aid of artificial light.
ii.□Hunt or capture during day and night.
iii.□Hunt by means of fire-arm which discharges a rim-fire cartridge of a caliber less than five comma six millimeters (e.g. a .22 fire-arm) only with regard to steenbuck, duiker and protected game birds.
iv.□Hunting / darting by means of any device which injects an intoxicating or a narcotic agent into such animal. This is only in as far as necessary for management purposes, disease control and the treatment or applying of medical procedures done by a registered veterinary surgeon in the practice of his/her profession. (Please note that any of the so called "Green hunts" are not permitted by this "Game Farm Standing Permit" and ordinary hunting permits must be applied for on an ad-hoc basis.

SPECIAL PERMIT CONDITIONS APPLICABLE

INTEGRATED PERMIT, STANDING PERMIT & REGISTRATION CERTIFICATE

1) This permit is an "Integrated Permit", as defined of Chapter 1 and issued in terms of Chapter 2, Regulation 4 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations, and;

2) This permit is a "Standing Permit", as defined of Chapter 1 and issued in terms of Chapter 2, Regulation 18 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations, and;

3) This permit is also a "Registration Certificate", as defined in Chapter 1 and issued in terms of Chapter 3, Regulation 33(1) and (2) of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

GAME FARM STANDING PERMIT

1) The property mentioned on this "Game Farm Standing Permit", is considered to be adequately enclosed as defined in Chapter 1 Section 2 and issued in terms of Chapter 4 Section 25 of the Nature and Environmental Conservation Ordinance 19 of 1974.

2) The property mentioned on this "Game Farm Standing Permit", is considered to be a "Registered Game Farm", as defined of Chapter 1 and in compliance with Chapter 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

3) The property mentioned on this "Game Farm Standing Permit", is considered to be a "Registered Wildlife Trader", as defined of Chapter 1 and in compliance with Chapter 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations.

4) If any of the following species appear on the "Game Farm Standing Permit", then the lifting of restricted activities is not applicable and such species is only listed for record purposes namely; Scimitar-horned Oryx, Arabian Oryx, Addax, Cape Mountain Zebra, Black-and White Rhinoceros, Oribi, African wild dog, Cheetah, Lion and Hyaenas. Please note that according to the departments approved translocation policy exotic animals can only be hunted or exported back to its country of origin.

5) No exemption for any restricted activity is applicable for the species as mentioned in paragraph three (3).

6) The permit holder must with sufficient notice to the Director, before any activity commences, apply on the prescribed application form, for a normal "ORDINARY Permit" to use any prohibited instrument or method or conduct any restricted activity with the species as mentioned in paragraph three (3). Such permit applications will be handled on ad hoc basis in compliance with new national legislation and policy guidelines.

7) The "Game Farm Standing Permit" authorizes the permit holder:
7.1) to issue a "Game Farm Hunting Permit / Permission" to a hunter;
7.2) to allow the hunter to hunt the applicable species on such property;

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

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BYLAE 1 / ADDENDUM 1

7.3) to sell the applicable species to a hunter.

GAME FARM HUNTING PERMIT / PERMISSION

1) The document herein referred to as a "Game Farm Hunting Permit / Permission" will be considered to be a "Game Farm Hunting Permit" as defined in Chapter 1 and 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations as well as a "Written Permission" and "Donation Document" as stipulated Section 39 and 41 of the Nature and Environmental Conservation Ordinance 19 of 1974.

2) The "Game Farm Hunting Permit / Permission" is only applicable for the particular species and specific property, as specified on the "Game Farm Standing Permit".

3) The permit holder is authorized to copy the "Game Farm Hunting Permit / Permission" document, as and when he / she my find need thereof.

4) The permit holder must allocate a series number for each "Game Farm Hunting Permit / Permission" issued by him / her, starting at number 0001 followed by the applicable year, e.g. 0001/2008.

5) The permit holder must keep record of all "Game Farm Hunting Permit / Permission" documents issued by him / her, in a file or register, according to the series numbers allocated per year.

6) The permit holder must BEFORE the hunt / selling / donation:
6.1) complete the hunter's or recipients particulars,
6.2) complete the species, sex and number of animals to be hunted / sold or donated;
6.3) sign and date each "Game Farm Hunting Permit / Permission" document that he / she issue;
6.4) hand over the original of such document to the hunter or recipient;
6.5) maintain a copy for record purposes.

7) The permit holder must AFTER the hunt / sale / donation:
7.1) indicate on the original document that was issued and all copies thereof, the species, sex and number of animals successfully hunted / wounded or lost / sold or donated;
7.2) sign and date the declaration as indicated on the "Game Farm Hunting Permit / Permission".

8) If the hunter is not a South African citizen (i.e. foreign client) then the permit holder must also complete the particulars of the Hunting Contractor and Professional Hunter involved.

9) The permit holder must on an annual basis, at the end of December of each year, submit to the Director, a copy of each "Game Farm Hunting Permit / Permission " issued by him / her.

10) If the permit holder fails to comply with any of these conditions the privilege to issue "Game Farm Hunting Permit / Permission" will be withdrawn immediately.

11) The "Game Farm Hunting Permit / Permission" authorizes the hunter or recipient:
11.1) to buy and or hunt the animal, and subsequent to the hunt / purchase or receipt;
11.2) to field dress, process, and transport the carcass;
11.3) to temporarily possess the dead specimen or derivative thereof, for a maximum period of 1 (one) year calculated from the day of the hunt / purchase / receipt.

12) The hunter or recipient must, at least 3 (three) months before the expiry of the 1 (one) year period, apply for a POSSESSION Permit, from the Director or applicable provincial department's issuing authority, in his / her province of residence, if still in possession of any carcass, derivative, part, specimen or trophy of the animal successfully hunted / purchased / received. The hunter or recipientr must return the original document together with his application for a possession permit.

13) The holder of such possession permit must on an ad hoc basis, apply for an ORDINARY Permit to carry out any additional / other restricted activity with any such specimen.

PERSONAL EFFECTS PERMIT / PERMISSION

1) The document herein referred to as a "Game Farm Hunting Permit / Permission" will be considered to be a "Personal Effects Permit / Permission" as defined in Chapter 1 and 3 of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004): Threatened or Protected Species Regulations as well as a "Written Permission" and "Donation Document" as stipulated Section 39 and 41 of the Nature and Environmental Conservation Ordinance 19 of 1974.

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

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BYLAE 1 / ADDENDUM 1

2) The permit holder may only issue a "Personal Effects Permit / Permission" to a hunter or recipient for dead specimens originating from his / her property.

LION AND / OR RHINO HUNTS

ANIMAL INTRODUCTIONS:
1.□A register must be kept in the prescribed format for all large predators and rhinoceros released onto and/or removed from the property.
2.□Large predators originating from any intensive wildlife systems or controlled environments must not be brought or released onto the propert
3.□In the case of lions & rhinoceros, every animal that are to be introduced, must be marked by a micro-chipping and photographed in an identifiable way, before such animal is released onto the property.
4.□The origin of predators to be introduced must be such that there will be no threat to the genetic integrity of populations already occurring in the Northern Cape Province
5.□In the case of lions, all future introductions will be limited to lions from the same geographical area.
6.□Large predators that are to be introduced must only be released into the approved large predator camps when such electric fencing is fully functional.
7.□Sufficient suitable prey species must be available to ensure survival of the large predators without such animals having to be fed in order to qualify as an extensive wildlife system.
8.□Large predators must be declared free of disease by the State Vet before being introduced.

FENCING PATROLS
9.□If a functional security alert system is in place fencing patrols must be done in such way that the whole outside perimeter is covered and an particular section of the fence is inspected at least once within a 72 hour period.
10.□If no functional security alert system is in place fencing patrols must be done in such way that the whole perimeter is covered and any particular section of the fence is inspected at least once within a 24 hour period.
11.□The fence must be maintained in such a manner that the large predators or rhinoceros remain adequately enclosed.

EMERGENCY PLAN / CONTINGENCIES
12.□Any wild animal that has escaped from the property and has caused damage must be treated as a damage causing animal.
13.□Standing written permission from the adjacent landowners must be obtained to cater for any emergency follow-up operations that might arise.
14.□In case of any breach of the security fence by any large predator, at least the following emergency procedures must be followed and recorded:
- □Intended plan of action;
- □Immediate notification to surrounding landowners and adjacent communities;
- □Contact the Department of Tourism, Environment and Conservation;
- □Contact the South African Police Service;
- □Procure a capture team and a qualified wildlife veterinarian;
- □Procure two qualified Big 5 professional hunters to follow up and destroy the animal if necessary.

LIABILITY:
15.□The permit holder and land owner accepts full responsibility for the introduction of the animal species to the property.
16.□The permit holder and landowner is aware of the risks of releasing the animals species onto his/her property and the consequences which may result thereof.
17.□The permit holder and landowner will not hold the Director or any official liable for any claims or costs which may incur as a direct result of the issue of a certificate of adequate enclosure permit pursuant to the above application.

HUNTING:
18.□The permit holder and landowner must ensure that any large predator or rhinoceros which is hunted must not be a put and take animal an such animal must qualify to be free ranging (wild) for at least a period of 24 months prior to the hunting thereof.
19.□No hunt may take place if not escorted by two Northern Cape Province registered professional hunters who are qualified to hunt Big 5 animals.
20.□No hunting of a large predator or rhinoceros must be allowed if the official representative from the Director is not present.
21.□Any official who attends the hunt has the full right to defend himself and anybody else should an emergency situation arise.
22.□If the hunter belongs to any hunting organisation the hunt may only take place in an approved hunting area according to the code of ethics conduct and good practice as supported by such organised hunting fraternity.

PROHIBITED HUNTING METHODS:
23.□No baiting or any luring of predator animals may take place.
24.□No tame or captive bred large predator may be hunted.
25.□No hunting of large predators or rhinoceros may take place from a vehicle or aircraft
26.□No hunting of large predators or rhinoceros with bow-and- arrow may be allowed.
27.□No hunting of predator animals may take place during the night or with the aid of an artificial light.
28.□Close to or pressed against a fence or in any other a situation from which it has no escape.
29.□No animal may be hunted which is under the influence of a tranquiliser, narcotic, immobilising or similar agent.

Signature of Issuing Authority

03 April 2014

Signature of Permit Holder

03/04/2014
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

BYLAE 1 / ADDENDUM 1

30. No other hunting method may be used to hunt an animal, if such method is prohibited by any applicable legislation.

SPECIAL ARRANGEMENTS FOR LARGE PREDATORS AND RHINOCEROS:

31. The Director must be notified in the prescribed format indicating the intended time of release as well as the specifics of the animal namely age, sex, microchip number and special identification markings.

32. The Director (or Mr. Wessel Jacobs 082 411 7179) must be notified in the prescribed format indicating the intended date and time of the intended hunt at least four weeks prior to the hunt.

33. The hunter must sign the prescribed declaration before the hunt commence. The original signed document will be submitted with the first copy of the hunting register. (No export of the hunting trophy will take place without submission of this document).

ADDITIONAL PERMIT CONDITIONS APPLICABLE

None

Signature of Issuing Authority

03 April 2014

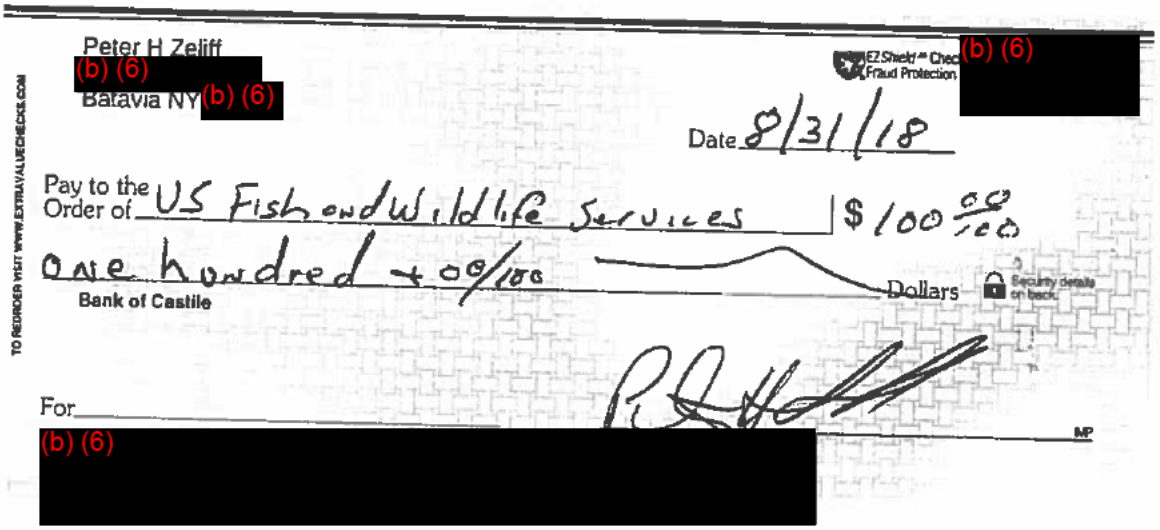
Signature of Permit Holder

03/04/2014
Date of Signature

Department of Environment and Nature Conservation - 90 Long Street - Private Bag X 6102, Kimberley 8300

(HQ - Kby) Tel: 053-807 7430 Fax: 086 5151 769 (Cal) Tel: 027-341 1779 Fax: 027-341 1718 (De Aar) Tel: 053-6310 601 Fax: 053-6310 343

RCVD SEP 6 2018



Peter H Zeliff
(b) (6)
Batavia NY (b) (6)

EZ Shield™ Check Fraud Protection (b) (6)

Date 8/31/18

Pay to the Order of US Fish and Wildlife Services $ 100 00/100

One hundred + 00/100 Dollars

Security details on back.

Bank of Castile

For (b) (6)

MP

TO REORDER VISIT WWW.EXTRAVALUECHECKS.COM

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 10 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hettervig	Mark	J.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tenino	WA	(b) (6)		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Milwaukie	OR	(b) (6)		USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** 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.

9/20/18

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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.

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

Marcie Helton (b) (6) [redacted]

(b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera Leo

   b. Sex (if known). males (3)

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:

      Mozambique
      Mosahmanzou Safaris
      Terminal de carga aeroporto Biera

   b. Date wildlife is to be hunted:

      Aug. 31st - Sept. 25th, 2018

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

      mosahmbanzou Safaris
      Grant Taylor

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

   b. Date wildlife was hunted:

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

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 foreign export/re-export document]:

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). Please see attached

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:
   Business Name: Safari Cargo Systems
   Address: Holding 34, 5th Ave.
   City: P.O. Box 30093 Jetpark 1469
   State/Province: Bredell
   Country, Postal Code: 1623

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

   NO

   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, local community, or government?

   Please see attached

   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 landowner that provide a conservation benefit to the species being hunted/species hunted?

   NO

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: N/A 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 8/20/18

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 governments 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 shipments 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).

Mashambanzou Safaris

From: Mashambanzou Safaros
Grant Taylor owner
Mozambique address- Terminal de Carga aeroporto Beira
Mozambique, Tel no + 258825330796, Ph 258 3 326486
email: grant@mashambanzousafaris.com

1 March, 2018

To Whom It May Concern:

Mr. Mark Hettervig, will be hunting will be hunting leopard, buffalo, and plains game with my company in the Tete Province in North central Mozambique in a hunting concession on the northern bank of Lake Cahora Bassa from 31 August to 25 September 2018. Please ensure Mr. Hettervig is provided a visitor's visa to cover these dates for his hunting safari. He will be flying back to the USA after his safari is completed in Mozambique.

Grant Taylor

Grant Taylor
Professional Hunter

PEDIDO DE ENTRADA EM MOCAMBIQUE
REQUEST FOR ENTRY VISA TO MOZAMBIQUE

RECIBO Nº

PREENCHER COM LETRA LEGIVEL
TO BE FILLED IN LEGIBLE LETTERS

RESERVADO AOS SERVICOS:
FOR OFFICIAL USE:

VISTO Nº

DATA DE EMISSAO
...../...../.....

VALIDADE
...../...../.....

UMA ENTRADA
Single entry [X]

DUPLAS ENTRADAS
Double entry [ ]

MULTIPLAS ENTRADAS
Multiple entries [ ]

APELIDO
Surname
Hettervig

NOME COMPLETO
Full name
Mark John

NOME DE SOLTEIRA
Maiden name
N/A

PAIS E LOCAL DE NASCIMENTO
Country and place of birth

DATA DE NASCIMENTO
Date of birth
(b) (6)

SEXO
Sex

ESTADO CIVIL
Marital status

NACIONALIDADE
Nationality

PASSAPORTE Nº
Passport Nº
(b) (6)

DATA DE EMISSAO
Date of issue
...../...../.....

Validade
Validity
...../...../.....

NACIONALIDADE DO P.te
P.te nationality

PROFISSAO/OCUPACAO
Profession/Occupation
OWNER of (b) (6)

CARGO QUE OCUPA
Position you hold
OWNER / Founder

INSTITUICAO, ORGANIZACAO OU EMPRESA ONDE TRABALHA
Institution, organization or firm you work
(b) (6)

ENDERECO DA RESIDENCIA PERMANENTE
Address of the permanent residence
(b) (6), Tenino WA (b) (6)

ESTEVE ALGUMA VEZ EM MOCAMBIQUE ?
Have you ever before been in Mozambique ?
SIM Yes [X] NAO No [ ]

JA FOI RESIDENTE EM MOCAMBIQUE ?
Have you ever been a resident in Mozambique ?
SIM Yes [ ] NAO No [X]

PORQUE SAIU DE MOCAMBIQUE ?
Why did you leave Mozambique ?
Hunt / tour over

DATA DE SAIDA
Date of exit
/ /

INDIQUE AS INSTUICOES E EMPRESAS A QUE ESTEVE LIGADO
Mention the institutions and firms to which you were attached
Mosanmbanzou Safaris

O PREENCHIMENTO INCORRECTO OU INCOMPLETO IMPLICA RESPOSTA TARDIA, DEVOLUCAO OU INDEFERIMENTO
INCOMPLETE OR INCORRECT FILLING IN OF THIS FORM MAY RESULT IN DELAY, RETURN OR REJECTION

DETALHE OS MOTIVOS DA ENTRADA EM MOCAMBIQUE Sport hunting safari
In detail give reasons for your entry in Mozambique
To hunt Leopard, Crock, Hyena, Chapman's Zebra

TEMPO DE ESTADA EM MOCAMBIQUE Length of stay in Mozambique	DATA DE ENTRADA Date of entry	DATA DE SAIDA Date of exit
30 days	../../..	../../..

FRONTEIRA DE ENTRADA Entry border	FRONTEIRA DE SAIDA Exit border
Beira International Airport	Beira International Airport

ENDERECO DA HOSPEDAGEM EM MOCAMBIQUE – Address of residence in Mozambique

PROVINCIA Province	DISTRITO District	CIDADE City	AVENIDA/RUA Avenue/street	CASA Nº House Nº
Sofala	Muanza	Muanza	N/A	N/A

FAMILIARES/AMIGOS RESIDENTES EM MOCAMBIQUE – Relatives, friends living in Mozambique

NOME COMPLETO Full name	NACIONALIDADE Nationality	PARENTESCO Relationship	ENDERECO Address
Grant Taylor	Zimbabwean	Safari Operator	Aeroporto da Beira
			Terminais de carga
			Beira Mozambique

RESERVADO AOS SELOS
Reserved for stamps

DATA
Date ../../..

ASSINATURA DO REQUENTE OU DA ENTIDADE SOLICITANTE
Signature of applicant or of the applying entity

ASSINATURA RECONHECIDA POR SEMELHANCA A EXISTENTE NO .....
Nº ..... **EMITIDO A** ../../.. **EM** .....

RESERVADO AOS SERVICOS For official use	DATA DE RECEPCAO
	../../..
	DATA DE ENTREGA
ASSINATURA DO FUNCIONARIO	../../..

Gracy Travel International, Inc.

706 S. Main Street
Boerne, Texas 78006
(210) 698-2611
(800) 299-8558
Fax (210) 591-7889
Email : christy@gracytravel.com
www.gracytravel.com

Mandate Letter

RE: SAP'S 520 APPLICATION

Passenger Name: Mark J. Hetterig

PASSPORT NUMBER: (b) (6) [redacted]

I Mark J. Hetterig AUTHORISE GRACY TRAVEL INTERNATIONAL TO PROCESS AND APPLY FOR MY (SAP'S 520) GUN PERMIT APPLICATION ON MY BEHALF. GRACY TRAVEL REPRESENTATIVES CAN ASSIST WITH QUESTIONS OR CONCERNS REGARDING THE APPLICATION.
MY HUNTING DATES ARE FROM_____UNTIL_____

NAME OF APPLICANT: Mark J. Hetterig

(Signature)

D. TYPE OF PERMIT (Indicate with an X)

1 Multiple import or export permit		2 Import permit		3 Export permit		4 In-transit permit		5 Temporary import or export permit	

E. PARTICULARS OF APPLICANT

1 **NATURAL PERSON'S DETAILS**

2 **Type of Identification** (Indicate with an X)

2.1	SA ID		Passport	

3	Identity number of natural person	H	E	T	T	E	M	J	4	2	3	M	U			-			
4	Passport number of natural person	(b) (6)																	
5	Surname	HETTERvig										6 Initials		M	J	H			
7	Full names	Mark JOHN																	
8	Date of birth	(b) (6)										9 Age		(b) (6)					
11	Residential address	(b) (6)																	
		Tenino, WA										(b) (6)		12 Postal Code		(b) (6)			
13	Postal address																		
	(b) (6)											Milwaukie, OR		14 Postal Code		(b) (6)			
15	Trade or profession	OWNER/Founder										16 If self-employed, specify							
17	Name of employer/company	(b) (6)																	
18	Business address																		
		Milwaukie, OR										19 Postal Code		(b) (6)					
20	Telephone number	20.1 Home	(b) (6)																
20.3	Cellphone number	(b) (6)																	
22	E-mail address																		

23 **Marital status** (Indicate with an X)

24	Single		Married	X	Divorced		Widow		Widower	
	Other (specify)									

25 **PARTICULARS OF APPLICANT'S SPOUSE/PARTNER** (If applicable)

25.1 **Type of Identification** (Indicate with an X)

25.1.1	SA ID		Passport	

25.2	Identity number of spouse/partner								-					-			-		
25.3	Passport number of spouse/partner																		
25.4	Full Name and Surname	Cheryl T. Hettervig																	

26 **JURISTIC PERSON'S DETAILS**

27	Registered company name																		
28	Trading as name																		
29	FAR number																		
30	Postal address																		

9 Validity of the transporter's permit — FROM — Date | | | | | - | | | - | | |

TO — Date | | | | | - | | | - | | |

10 Transport route

1. DETAILS OF FIREARMS

1

1.1 Type	1.2 Action	1.3 Calibre	1.4 Model	1.5 Make	1.6 Frame or receiver serial number	1.7 Barrel serial number
Rifle	BOLT	338 Rum	SAKO F	SAKO	984681	984681
Rifle	BOLT	280 Imp	Ackerly	Ackerly	D6631349	D6631349

2 DETAILS OF AMMUNITION

2.1

2.1.1 Type	2.1.2 Quantity
338 Rum	4 BOXES
280 Imp	4 BOXES

2.2

2.2.1 Type	2.2.2 Quantity

3 **DECLARATION BY PERSON WHO IS LAWFULLY IN POSSESSION OF THE FIREARM(S)**

I hereby declare that the above firearm(s) is/are legally in my possession and that I propose to supply it to the applicant once the necessary permit(s) has/have been obtained and that the particulars of the firearm(s) are correct and accurate.

4 **SIGNATURE OF PERSON CURRENTLY IN POSSESSION**

4.1 Mark J. Hettervig
Name of person currently in possession in block letters

4.2 Date 2018-02-04 April

4.3 Signature of person currently in possession

4.4 Place Washington

5 **DECLARATION OF APPLICANT**

I am aware that it is an offence in terms of section 120 (9)(f) of the Firearms Control Act, 2000 (Act No 60 of 2000), to make a false statement in this application.

J. **SIGNATURE OF APPLICANT** (Sign only if applicable)

1 Mark J. Hettervig
Name of applicant in block letters

2 Date 2018-02-04 April

3 Signature of applicant

4 Place Washington

K. (This section must be completed only if the applicant cannot read or write)

1 Right index fingerprint of applicant

2 Fingerprint designation

4

3 Date

Name of applicant in block letters

5 Place

6 **PARTICULARS OF POLICE OFFICIAL DEALING WITH APPLICATION**

6.1 Name of police official in block letters

6.2 Persal number of police official

6.3 Rank of police official in block letters

6.4 Signature of police official

7 **PARTICULARS OF WITNESS**

7.1 Name of witness in block letters

7.2 Persal number of witness

7.3 Rank of witness in block letters

7.4 Signature of witness

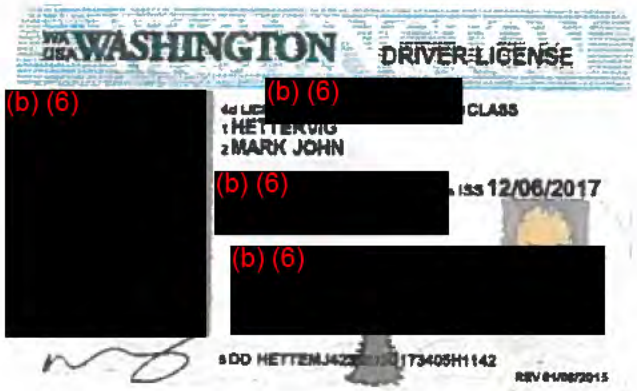
L. **PARTICULARS OF INTERPRETER**
(This section must be completed only if the applicant cannot read or write or does not understand the content of this form.)

1 Name and surname of interpreter

2 Identity/Passport number of interpreter

3 Residential address

4 Postal Code


WA USA WASHINGTON
DRIVER LICENSE
(b) (6)
(b) (6)
CLASS
1 HETTEMJ
2 MARK JOHN
(b) (6)
ISS 12/06/2017
(b) (6)
9 DD HETTEMJ423
173405H1142
REV 01/08/2015

Mark

TSA #

(b) (6)

We the People
Of the United States,
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
USA
UNITED STATES OF AMERICA
P
USA
(b) (6)
HETTERVIG
MARK JOHN
UNITED STATES OF AMERICA
(b) (6)
OREGON, U.S.A.
28 Mar 2015
27 Mar 2025
SEE PAGE 27
M
United States
Department of State
USA
P<USAHETTERVIG<<MARK<JOHN<<<<<<<<<<<<<<<<<<<<
(b) (6)

Lifetime Immunization Record
Registro de Inmunizacion

AFFIX ALERT LABEL HERE WHEN AVAILABLE

Full Name / *Nombre*: Mark Hettervig

Birthdate / *Fecha de Nacimiento*: (b) (6)

Patient's ALERT # / *Numero de ALERT del Paciente*

Patient's Social Security # / *Numero de Seguro Social del Niño*

Parent/Guardian / *Padre/Tutor*

Comments / *Comentarios*

(b) (6)

Vaccine / *Vacuna*	Dose # / *Dosis*	Vaccine Type / *Tipo de Vacuna*	Date Given Mo/Day/Yr / *Fecha*	Provider / *Médico o Clínica*	Date Next Due / *Próxima Visita*
Influenza (annual) *Influenza (anual)*	1				
	2				
List each mo/day/yr vaccine given *Indica fecha mes/dia/año para cada inyeccion*					
Pneumococcal PPV23	1				
	2				
Hepatitis A	1				
	2				
	3				

Other (travel, IG) *Otras (vacunas de otros paises, IG)*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*	Vaccine Type / *Tipo de Vacuna*	Dose # / *Dosis*	Date Given Mo/Day/Yr / *Fecha*
	Yellow Fever	1	12/5/11						

Oregon Adult Immunization Coalition

Oregon Partnership to Immunize Children

OREGON HEALTH DIVISION

SAVE THIS DOCUMENT. IT CAN BE USED THROUGHOUT THE USA

CONSERVE ESTE DOCUMENTO SE PUEDE USAR EN TODO LOS ESTADOS UNIDOS.

Bring this record to children's facility and school registration to complete forms. Present this record at each visit to your doctor or clinic.

Es necesario monstrar ésta tarjeta al registrarse en la escuela o guarderia. Presente ésta tarjeta en cada visita con su médico o clínica.

TB Clearance - Mantoux/PPD (Tine Not Accepted)			
Date given / *Fecha*			Provider/Clinic / *Médico o Clínica*
Date read / *Fecha Prueba Fue Leido*			
Induration (mm) / *Reaccion en mm*			Phone and Fax / *Telefono y Fax*

Make sure to check that immunizations are up-to-date at every visit to your health care provider.

Verifique en cada visita con su médico que las vacunas en ésta tarjeta esten al día.

To order additional Lifetime Immunization Records please contact your County Health Department Immunization Program 53-IIR (11/00 revised)

Full Name _____ **Birthdate** _____
Nombre *Fecha de Nacimiento*

Vaccine *Vacuna*	Dose # *Dosis*	Vaccine Type *Tipo de Vacuna*	Date Given Mo/Day/Yr *Fecha*	Provider *Médico o Clínica*	Date Next Due *Próxima Visita*
DTaP, DTP, DT, Td (adult) (diphtheria, tetanus, pertussis) *Difteria, tétanos, tos ferina*	1				
	2				
	3				
	4				
	5				
Td Booster every 10 years *Td dosis de refuerzo cada 10 años*	Td Booster	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____	mo/day/yr _____ mo/day/yr _____
Polio IPV,TOPV	1				
	2				
	3				
	4				
Chickenpox (varicella) *Varicela*	1				
	2				
	If had disease, give date. *Fecha de Enfermedad.*				
MMR (combined *combinación*) or **measles only** *sarampión sola*	1				
	2				
	1				
	2				
Hepatitis B ☐ 3 dose series ☐ 2 dose series	1	mcg			
	2	mcg			
	3	mcg			
	HBIG administered at birth? Yes No				
Hib (Haemophilus influenzae type b) *Haemophilus influenzae tipo b*	1				
	2				
	3				
	4				
Pneumococcal Conjugate PCV7	1				
	2				
	3				
	4				

If using a combined vaccine, write the product name *in all the above spaces* designated for vaccine type.

Visit our website at http://www.ohd.hr.state.or.us/ccfh/imm *Visita nuestra pagina del web http://www.ohd.hr.state.or.us/ccfh/imm*

To request this material in an alternate format (e.g., braille), please call (503) 731-4020.
Para obtener esta tarjeta en otro medio de información (braille, audio, imprenta grande), llamar al (503)731-4020.

"Mashambanzou Safaris Ltd and J & P Associates Invoice

Date: 8/20/2018

Hunt Sold To:	Mark Hettervig, (b) (6) Oregon City, OR (b) (6)
Professional Hunter Providing Hunt:	Grant Taylor owner Mashambanzou Safaris, Mozambique address- Terminal de Carga aeroporto Beira - Mozambique, Tel no + 258825330796, email: grant@mashambanzousafaris.com
Hunt Booked By:	Mashambanzou Safaris Ltd, Joe Demby, J & P Associates, 5550 Vargo Lane, Prince George, VA 23875 phone: 804-586-1698
Hunt Type:	18 day Leopard, crocodile, plains game hunt

Cancellation Policy & Legal: Cancellation of a Safari if done 6 months prior to the commencement date will allow the client a full refund of all payments made. However, if a cancellation is made within six months of the safari all payments may be transferred to the following year as a deposit on another future hunt based on the following years prices. If the client chooses not to forward his deposit he will be charged a 50% cancellation fee of funds paid. If a cancellation is done with in 2 months of the safari date all deposits will be lost completely. In the event full payment is not received within 30 days of the completion of the safari, interest will begin to be charged at 10 % per annum on the remaining funds owed. Any legal discrepancies will be handled according to the laws of the country the safari took place.

Indemnity Clause: Mashambanzou Safaris and Mashambanzou Safaris Ltd. will not be held responsible for any loss, damage, or accident incurred by a client while they are on Safari with the company providing the hunt. Mashambanzou Safaris will not be held responsible in the event of loss of hunting days due to lost luggage or flight delays.

Hunt Date: Hunter will be picked up at Tete Airport and transported to camp on 31 August 2018. The Hunt will start on 1 September and run for 18 days ending on 18 September 2018. Hunter will be transported back to Tete Airport on 19 September 2018 for flight out to USA.	Number of (Days) (Items)	Daily Rate	Total Cost
14 day hunt for Leopard, croc, hippo, and plains game	14	$1,200.00	$16,800.00
4 days crocodile, hyena, and plains game	4	$600.00	$2,400.00
Transportation Fee to hunting area and return to Airport		$700.00	$700.00
Gun Permit, for each gun is $250	2	n/a	$500.00
Hunting License Permit is $300	1	n/a	$300.00
Pre-baiting cost $250 per day	5	$250.00	$1,250.00

Crocodile, red duiker, L suni, L hartebeest, with other plains game to be determined. All game fees for animals taken that are not included in package will be paid for at the end of the hunt based on trophy fee list provided below. Every attempt will be made to track and recover wounded game; however, if a wounded animal cannot be recovered, the hunter will be responsible for paying the full trophy fees for that animal at the normal rate. Wounded animals are determined by the professional hunter regardless of whether there is blood or not. Note due to nature of hippo and crocodile hunting any shot taken will be considered a hit unless video evidence proves otherwise. Any female animal shot will incur full price and will not be exportable.

Species Trophy Fee	Qty	Trophy Fee	Total
Nile Crocodile	2	$3,250.00	$6,500.00
Lichtenstein Hartebeest	1	$3,200.00	$3,200.00
Hyena	3	$1,750.00	$5,250.00
Leopard	1	$8,000.00	$8,000.00
Chapmans Zebra	1	$3,000.00	$3,000.00
bait costs estimated	TBD		$500.00
Trophy fee total cost			$26,450.00

Cost of hunt- less trophy fees (Sub Total)	$21,950.00

Signatures	A deposit of ($9200) was received via check #15884 on 13 March 2018 to book the hunt. A 2nd payment to cover the remainder of the daily ($12750)which includes remaining amount of daily rates, transportation cost, gun permits, and hunting license, prebaiting daily costs rates, was received on 6 August 2018 (check # 17704). A check was received on 18 Aug for $26450 via check #17791 . These trophy fees will be placed in escrow until the hunt is completed. Any funds owed the hunter will be mailed back to him immediately at the end of the hunt via a Wells Fargo Business cashers check. Please make all checks as payment to J & P Associates and mail to 5550 Vargo Lane, Prince George, VA 23875	-$48,400.00
Date: Client:	Hunter has 26450 in escrow to be used for trophy fees	$26,450.00
Date: Outfitter:	Total Cost of Safari (TBD)	TBD

OTHER COSTS: Dipping Packing and Export Documentation is calculated at the end of the safari and will be paid to the agent handling the dipping and packing and export.

2018 Trophy Fees

Animals	Fees US$	Animals	Fees US$
Elephant	$15,000	Lion	$15,000
Buffalo (1st)	$4,500	Leopard	$8,000
Buffalo (2nd) if available	$8,000	Sable	$5,000
Nyala	$3,250	Eland	$3,000
Kudu	$3,000	Lichtenstein	$3,200

DOCUMENT INCLUDES VISIBLE FIBERS, CHEMICAL REACTIVE PROPERTIES AND FEATURES A FOIL HOLOGRAM

[redacted] (b) (6)

PACIFIC CONTINENTAL BANK
1-877 231-2265 therightbank.com

96-513/1232

[redacted] (b) (6)

8/29/2018

PAY TO THE ORDER OF U.S. Fish & Wildlife Service $ **100.00

One Hundred and 00/100********** DOLLARS

U.S. Fish & Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

MEMO Hettervig Leopard Permit

AUTHORIZED SIGNATURE

DETECTION SINGLE REPEALS A LOCK WHEN TESTED

TRUE WATERMARK PAPER - HOLD TO LIGHT TO VIEW

PAPER CONTAINS TONER ADHESION PROPERTIES

HEAT SENSITIVE RED IMAGE DISAPPEARS WITH HEAT

[redacted] (b) (6)

SIERRA CASE PARTS LLC

[redacted] (b) (6)

U.S. Fish & Wildlife Service

8/29/2018

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
8/29/2018	Bill	082918-1	100.00	100.00		100.00
					Check Amount	100.00

Cash - General - Pacific	Hettervig Leopard Permit	100.00

Nelson, Emma <emma_nelson@fws.gov>

Fwd: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

10 messages

Williams, Robert <robert_williams@fws.gov> Fri, Nov 2, 2018 at 4:28 AM
To: Emma Nelson <emma_nelson@fws.gov>

PRT 06713D this is for you. I have his Bontebok which is why he sent the email to me.

Bob

---------- Forwarded message ---------
From: <(b) (6)
Date: Thu, Nov 1, 2018 at 4:36 PM
Subject: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG
To: Williams, Robert <robert_williams@fws.gov>

Good Morning-

I would like to check the status of the import permit for Mark Hettervig for his lions. Can you let me know when he can expect to get it? Please let me know if you need any additional information to look it up for me!

(b) (6)

From: Mark Hettervig <(b) (6) >
Sent: Thursday, November 1, 2018 6:17 AM
To: Jackie Hodgkinson <idea@lifeform.co.za>
Cc: (b) (6)
Subject: Re: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Marc can would check on our citi's permit on the lions

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------

From: Jackie Hodgkinson <idea@lifeform.co.za>

Date: 11/1/18 2:38 AM (GMT-08:00)

To: Mark Hettervig (b) (6)

Cc: (b) (6)

Subject: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Dear Mr. Hettervig,

We are pleased to have this opportunity to assist you with the forwarding of your trophies hunted with Shumba Safaris. We trust that you had a very enjoyable and memorable experience!

PLEASE NOTE: as you have Lion trophies included in your order, import permits will be required from US Fish & Wildlife to enable you to import the Lion trophies into your country. We will require that you obtain this import permits nearer to completion of your order.

Please check the attached order to ensure that all the trophy items required are reflected on your order. As the issuing of export permits can take up to 60 days, we would appreciate receiving your confirmation that your order is correct at your earliest convenience to enable us to make application for the export documentation soonest.

It has come to our attention that U.S. Fish & Wildlife advised that any trophy consignments entering the U.S. with documentation that is not in the client's full names, will now be sent back to the country of export for correction.

In lieu of the above, please confirm your full legal name and address as reported to the US Social Security Administration to prevent any difficulties during the clearance of your consignment on arrival in the U.S.A.

Important General Information on the USDA/APHIS perspective.

USDA Approved Taxidermist or Tannery (Fur Dressing Company)

It is important to note that most US Taxidermy Studios or businesses contract the tanning of animal hides to a professional fur-dressing company or tannery for the purpose of rendering a product acceptable for taxidermy mounting or the manufacture of a final product.

Subsequently, your appointed US Taxidermist may direct your shipment to be expedited directly to the fur-dressing company they work with. In some instances they may also direct your shipment to be expedited directly to their studio

or premises. Most importantly, it is always advisable to ensure that the US Taxidermy that you appoint to handle the final preparation of your trophies is USDA Approved.

The above is applicable to any, (dip and pack only), ruminant trophies (antlers/horns - of hoofed animals) and especially where swine trophies (Warthog and Bush pig), is contained in the shipment. Shipments containing Primates, Rodents or Civet Cats may possibly require additional filing with the CDC and U.S. Department of Public Health.

We would kindly like to request that you provide us with the Taxidermist's address to which your consignment should be delivered as well as your Clearing Agent information..

PLEASE NOTE: Life-Form Taxidermy does not accept responsibility for hair slip or damage to skins which are only dipped and shipped, as we have no control over field preparation or tanning processes used by other companies.

TAGGING OF TROPHIES: Please note that where more than one of the same species is received at our studio, they will be reflected on your order as "A" ; "B" etc. according to size, "A" being the largest.

We can advise that dip and pack consignments, are generally ready for handover to our freight agent within two to three months from full payment, provided the Outfitters supply us with all the relevant paperwork at time of delivery of the trophies to enable us to apply for the necessary export documentation timeously.

In order for us to begin preparing your trophies, we do request full payment, which can be made by wire transfer into our Bank account (details included on page 3 attached). **Please ensure that your order number (50016) is stated on the transfer.** Kindly note that payments may be made by a cashier's cheque mailed to our above P.O. Box address, however payments received by means of a cheque may take 10-12 weeks to be cleared. We kindly request that payments be made directly into our bank account.

INSURANCE: Please note: Life-Form Taxidermy DOES NOT arrange for the insurance of your consignment whilst in transit, as the insurance will be arranged by the freight agent. Attached please find IMPORTANT information with regard to the insurance cover taken for your consignment. Should you wish to insure your consignment for a different value to the attached schedule, please advise us in writing so that the freight agent may liaise with the Under Writers in this regard and advise you accordingly. The premium amounts to 1% of the total sum insured and is payable directly to the freight agent at time of exporting.

We look forward to hearing from you and can advise that we are available for any assistance you might require.

Wishing you a lovely day.

Kindest Regards.

Jackie Hodgkinson
Export Administrator
Forward on behalf of Life-Form Taxidermy cc
idea@lifeform.co.za
www.lifeformtaxidermy.com

LIFE-FORM TAXIDERMY
Realism, Beauty & Permanence
Guardian of the Hunters' Dreams

№ 7 Aluminium Road / P O Box 763
White River
Mpumalanga, 1240
South Africa
Office: +27 13 750 1470
Fax: +27 13 750 1512

Life-Form Taxidermy cc Disclaimer and Confidentiality Note

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Nelson, Emma <emma_nelson@fws.gov> Mon, Nov 5, 2018 at 2:57 PM
To: (b) (6)

Good morning Ms. Helton,

Thank you for your email. Because you are not indicated in Mr. Hettervig's application as a contact, I cannot divulge specific information regarding his application. However, if Mr. Hettervig would like to send me a note authorizing communication with you, I am happy to give you an update with the application.

Thank you,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296
[Quoted text hidden]

(b) (6) Mon, Nov 5, 2018 at 3:54 PM
To: "Nelson, Emma" <emma_nelson@fws.gov>
Cc: Mark Hettervig (b) (6)

Hi Emma-

Certainly, Mark is on this e-mail chain and he will have no problem adding me to have communication with you about his application!

Mark, can you please give me permission to discuss your Lion application with USFW Services.

Thank You~

Marcie Helton

(b) (6)

[redacted]

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To: (b) (6)
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

[Quoted text hidden]

Mark Hettervig (b) (6) > Mon, Nov 5, 2018 at 3:59 PM
To: (b) (6) "Nelson, Emma" <emma_nelson@fws.gov>

Yes absolutely thanks mark

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From (b) (6)
Date: 11/5/18 12:54 PM (GMT-08:00)
To: '"Nelson, Emma"' <emma_nelson@fws.gov>
Cc: Mark Hettervig (b) (6)
Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Hi Emma-

Certainly, Mark is on this e-mail chain and he will have no problem adding me to have communication with you about his application!

Mark, can you please give me permission to discuss your Lion application with USFW Services.

Thank You~

Marcie Helton

(b) (6) [redacted]

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To: (b) (6) [redacted]
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Tue, Nov 6, 2018 at 9:44 AM
To: (b) (6) [redacted]

Good morning Ms. Helton,

Thank you, Mr. Hettervig for confirming Ms. Helton as a authorized contact for your application. Mr. Hettervig's application, PRT-06713D, is currently pending. Our office is in the process of making the necessary findings on sport-hunting in Mozambique related to Mr. Hettervig's application.

Thank you,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

[Quoted text hidden]

---

8 attachments

(b) (6) [redacted] **image001.jpg**
3K

(b) (6) [redacted] **image002.jpg**
3K

(b) (6) [redacted] **image003.jpg**
3K

image004.jpg
13K

(b) (6)

image002.jpg
3K

(b) (6)

image003.jpg
3K

(b) (6)

image001.jpg
3K

image004.jpg
13K

(b) (6)
To: "Nelson, Emma" <emma_nelson@fws.gov (b) (6)

Tue, Nov 6, 2018 at 4:45 PM

Good Afternoon Emma-

Thank you for the update, can you give me a time frame on when we can expect to get his permit?

Thank You~

Marcie Helton

(b) (6)

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 6, 2018 6:45 AM
To: (b) (6)
Cc:

[Quoted text hidden]

[Quoted text hidden]

(b) (6) Tue, Nov 6, 2018 at 6:03 PM
To: "Nelson, Emma" <emma_nelson@fws.gov>

Hi Again Emma-

I just wanted to clarify that the permit we are inquiring about is for Mr. Hettervig's Lions that he hunted in South Africa and not in Mozambique. Can you please confirm that we are talking about the same import permit?

Thank You~

Marcie Helton

(b) (6)

(b) (6)

From: (b) (6)
Sent: Tuesday, November 6, 2018 1:45 PM
To: 'Nelson, Emma' <emma_nelson@fws.gov>; (b) (6)
Subject: RE: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good Afternoon Emma-

Thank you for the update, can you give me a time frame on when we can expect to get his permit?

Thank You~

Marcie Helton

(b) (6) [redacted]

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 6, 2018 6:45 AM
To: (b) (6) [redacted]
Cc [redacted]

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[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Tue, Nov 13, 2018 at 8:42 AM
To: (b) (6) [redacted]

Good morning Ms. Helton,

Thank you for your reply. The application we currently have pending for Mr. Hettervig, PRT-06713D, is for the import of three male lions from Mosahmanzou Safaris in Mozambique. If this is incorrect, please have Mr. Hettervig, or you as his representative, submit revised documentation to me via email so that the proper changes can be made. In regards to the timeline, we are currently reviewing Mozambique's conservation and management of lion populations and as such, it is difficult to provide an estimate for when these findings will be finalized.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

[Quoted text hidden]

---

3 attachments

(b) (6) [redacted]

image001.jpg
3K

image001.jpg
3K

image001.jpg
3K

(b) (6)

Fri, Dec 7, 2018 at 2:08 PM

To: "Nelson, Emma" <emma_nelson@fws.gov>

Good Morning Emma-

I apologize for the delay in getting the corrected application to you. Please see updated application. I hoping you can use the documents that were originally provided as the only change is the location of where the lions here taken was not Mozambique but South Africa. I got Mr. Hettervig's hunts mixed up on the application. Please let me know what else you need to complete the import permit process!

Thank You-

(b) (6)

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Tuesday, November 13, 2018 5:43 AM
To: (b) (6)
Subject: Re: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG

Good morning Ms. Helton,

Thank you for your reply. The application we currently have pending for Mr. Hettervig, PRT-06713D, is for the import of three male lions from Mosahmanzou Safaris in Mozambique. If this is incorrect, please have Mr. Hettervig, or you as his representative, submit revised documentation to me via email so that the proper changes can be made. In regards to the timeline, we are currently reviewing Mozambique's conservation and management of lion populations and as such, it is difficult to provide an estimate for when these findings will be finalized.

[Quoted text hidden]

[Quoted text hidden]

> [Quoted text hidden]
> [Quoted text hidden]

[Quoted text hidden]
[Quoted text hidden]

(b) (6) [redacted]

From: Nelson, Emma <emma_nelson@fws.gov>
Sent: Monday, November 5, 2018 11:58 AM
To: (b) (6) [redacted]
Subject Re [E TERNAL] FW GAME TROPHIES DIP & PACK TA IDERMY ORDER 50016 MR MARK J HETTERVIG

Good morning Ms. Helton,

Thank you for your email. Because you are not indicated in Mr. Hettervig's application as a contact, I cannot divulge specific information regarding his application. However, if Mr. Hettervig would like to send me a note authorizing communication with you, I am happy to give you an update with the application.

Thank you,

Emma

Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

---------- Forwarded message ---------
From (b) (6) [redacted]
Date: Thu, Nov 1, 2018 at 4:36 PM
Subject: [EXTERNAL] FW: GAME TROPHIES - DIP & PACK TAXIDERMY ORDER 50016 - MR. MARK J. HETTERVIG
To William , Robert robert william @fw gov

Good Morning-

I would like to check the status of the import permit for Mark Hettervig for his lions. Can you let me know when he can expect to get it? Please let me know if you need any additional information to look it up for me!

Marcie Helton

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

Life-Form Taxidermy cc Disclaimer and Confidentiality Note

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HETTERVIG.pdf
483K

Nelson, Emma <emma_nelson@fws.gov> Tue, Dec 18, 2018 at 8:24 AM
To: (b) (6)

Good morning Ms. Helton,

Thank you for your email. I will add this to the file and change it to South Africa instead of Mozambique. If I have any additional questions I will let you know.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

[Quoted text hidden]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hettervig	Mark	John	

(b) (6) [redacted]

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

[redacted]

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Milwaukie	Oregon	(b) (6) [redacted]		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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.

12/7/18

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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.

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

Marcie Helton (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo 3 male lions

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Shumba Safaris established in 1993 and situated in the North Eastern part of South Africa, known as the Lowveld, home to the jewel of African Game Reserves – The Kruger National Park, and South Africa's prime Big 5 destination.

b. Date wildlife was hunted:

May 7, 2018 to May 20, 2018

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

Shumba Safaris outfitter is Jan Dumon

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 foreign export/re-export document]:

Life Form South Africa 7 Aluminium Street, White River, South Africa, 1240

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). Already submitted with original appliation

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:
Business Name: Life Form
Address: 7 Aluminium Street, White River, South Africa 1240
City:
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

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, local community, or government?

$61,000 for 3 lions

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 12/7/18

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 governments 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 shipments 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).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DEMASKE	MADELINE	MARIE	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number
(b) (6)	

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. Do not use P.O. Boxes)			
(b) (6)			
1.b. City	1.c. State	1.e. County/Province	1.f. Country
GREELEY	COLORADO	(b) (6)	US

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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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.

Madeline Demaske — 08/27/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

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 a trophy 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 4-6 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.

PRO CARGO USA 16619 MORALES ROAD HOUSTON TEXAS 77032 — SELF ADDRESSED ENVELOPE ENCLOSED

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

CINDI RULON —— CINDI.RULON@PROCARGOUSA.COM 281-220-3176

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO 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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

   RIETBOKLAAGTE 642, MAGUDA, PONGOLA , 3170
   DISTRICT PAULPIETERSBURG, PROVINCE KWAZULU NATAL

   b. Date wildlife was hunted:

   May 7, 2018

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

PROFESIONAL HUNTER IS SEAN GARRETH KELLY
GARY KELLY SAFARIS 21 SPRINGSIDE ROAD HILLCREST KWASULU NATAL SOUTH AFRICA 3610

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 foreign export/re-export document]:

UNIVERSAL TROPHY SERVICES
PLOT 114 BASHEWA
PRETORIA 0056, SOUTH AFRICA

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). ------PERMITS ATTACHED--------

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:	
Business Name:	UNIVRSAL TROPHY SERVICES
Address:	PLOT 114 BASHEWA
City:	PRETORIAL 0056
State/Province:	SOUTH AFRICA
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Additional information is attached------

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, local community, or government?

Additional information is attached-------

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Additional information is attached--------

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

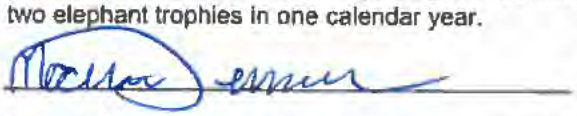
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature:  Date: 8/27/18

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 governments 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 shipments 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).

Madeline Demaske – Lion permit additional application information:

9a) Do you have any information regarding the population status or trend data on the species hunted?

This information was provided by our outfitter: The current property forms part of the Wild Managed population of Lions in South Africa, as defined in terms of the Biodiversity Management Plan for Lion in South Africa. Furthermore, the property is contributing to the meta-population for the province of KwaZulu-Natal and subscribes to the principles for meta-population management as defined by the provincial conservation authority (Ezemvelo KwaZulu-Natal Wildlife). There are currently 18 lions on the property, of which three are available for offtake. Such offtakes will mimic natural population changes wherein old males are forced out of the pride structure. The property has had lions for the preceding 10 years and have been managed to ensure the genetic integrity of the prides on the property.

There are 18 lions on the concession. 5 Males, the rest are females & cubs. We have been advised that there are too many Lions on the concession & have been allocated 3 to take off.

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?

This information was provided by our outfitter: Hunting permit and licenses fees are paid to the provincial conservation authority, Ezemvelo KwaZulu-Natal Wildlife, with such funds being utilized to manage sustainable resource use in the province. The funds assist in the processing of hunting permits wherein the sustainability of each application is assessed and approved when appropriate.

The funds are used in various ways, but mainly for paying scouts for anti-poaching initiatives, the re-establishment of the species, security, upliftment of the area including fencing & roads.
The permit costs are R1000 & the concession fee is $35 000

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?

Over $60,000 USD was given to the conservancy. This money has been ear-tagged for ranger education, community education, improvements to the property, and lion research. Currently, there are rangers controlling and protecting the reserve 24 hours a day. Much of the funds from the lion hunt will be directed into educating such rangers with the hopes to add additional rangers to the full-time patrol of the property. The remainder of the $60,000 will be directed to local communities to build schools, facilitate clean water treatment, provide jobs, food and promote health.

The safari outfitter funds the landowners through the concession fees paid by clients. These funds are used for the protection of game. Should there be no fees, there will be no protection of the game initiatives (scouts).

EZEMVELO KZN WILDLIFE

conservation. Partnerships & Prosperity

ORIGINAL

ORDINARY PERMIT

Fee: R 1 100.00
Receipt No: 1558/2018

Permit No: OP 1482/2018
Contact: Miss S.M. Hughes

This permit is issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004; and in pursuance of the provisions of the Nature Conservation Ordinance No 15 of 1974 , Chapter 3 and the Regulations framed thereunder.

The permit is issued to:

Passport: 49743485

Madeline Demaske
c/o"Anton J Marais"
Rietboklaagte 642
Maguda
Pongola
3170

Residential Address
c/o"Anton J Marais"
Rietboklaagte 642
Maguda
Pongola
3170

Conservation District: Paulpietersburg
Province: KwaZulu-Natal

In the capacity of Hunting Client
To Hunt and Temporary Possess the following species of Game

on the property known as Rietboklaagte 642
Ngotshe District, Magudu Pongola

LION *(PANTHERA LEO)*
1 (One) Male

Hunting Client:
M Demaske
Passport: (b) (6)
Residential (b) (6)
Hillcrest
(b) (6)

Postal (b) (6)
Hillcrest
(b) (6)

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE

Conservation Partnerships & Ecotourism

ORIGINAL

Hunting Outfitter:
Mr G C Kelly
ID Number: 5202055003088

Residential: Beverley Farm
Dargle

Postal: C/O Garry Kelly Safaris
P.O.Box 143
Dargle
3265

Professional Hunter:
Mr G C Kelly
ID Number: 5202055003088

Residential: Beverley Farm
Dargle

Postal: C/O Garry Kelly Safaris
P.O.Box 143
Dargle
3265

Weapon: Rifle

Hunting Method: Walk & stalk

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only:
   (i) from : 01 January 2018
   to : 01 December 2018
   (ii) in the original
   (iii) if all 4 pages are signed by the permit holder named above
   (iv) to the permit holder named above
2. This permit/licence/certificate is issued subject to compliance with all other relevant legislation and does not preclude the permit holder from adherence thereto.
3. By signing the permit or licence the holder accepts, and agrees to comply with the conditions under which it is issued.
4. This permit is not transferable
5. Any unauthorised alteration to this permit shall render it invalid
6. This permit is valid only within the province where it was issued

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE™

Conservation, Partnerships & Ecotourism

ORIGINAL

7. The holder of the permit shall, at the request of a person authorised in terms of applicable legislation so to demand, forthwith produce such permit to such person.

8. This permit shall be invalid until such time that it is signed by the permit holder.

9. This permit shall be deemed invalid if it is lost or destroyed and no copy thereof shall be issued.

10. The prescribed fee payable for the issuing of this permit shall not be refunded.

11. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence.

12. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

13. The issuing authority shall determine the species and restricted activities for which this permit will apply.

14. If this permit applies to hunting, the holder of this permit must: a. Have a copy of this permit authorising the hunt, on his or her person during the hunt: b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating: i) the permit number and date of issuance of the permit ii) the species, sex and number of animals hunted; and iii) the location where the hunt took place.

15. Return the original permit to the issuing authority forthwith after expiry of the permit.

16. To be completed by the landowner after completion of the hunt: Name and signature of the landowner... Species, number and sex of the animals hunted

17. This permit/certificate is subject to the provisions of any applicable law in force during the period of validity of the permit/certificate.

18. The holder of this permit may also allow the holder of a Special Game Licence to hunt the game shown herein during the Closed Season. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

19. The holder of this permit may also allow the holder of a relevant Game Licence to hunt the game shown herein. However if this permit applies to a specimen listed in the Threatened or Protected Regulations the person hunting the animal must also be in possession of a permit issued by Ezemvelo KZN Wildlife to enable the hunting to take place.

20. The attached return of the hunting permit must be completed by the holder. The completed permit to be returned to the Chief Executive, E KZN Wildlife, P O Box 13053 Cascades, 3202 or emailed to permits@kznwildlife.com upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO
KZN WILDLIFE
Conservation, Partnerships & Ecotourism

ORIGINAL

21. This permit is issued to the client named above and does not entitle the Professional Hunter and/or the Hunting Outfitter to hunt the species listed herein with another client, either on the property stipulated on the permit, or any other, should the hunt not be successful.

22. The Permit Holder may allow a Professional Hunter or his Client to hunt the leopard. HOWEVER the Export of Trophies will not be permitted under any circumstances, and no negotiations will be entered into in this regard.

23. Should the hunt be successful the client must produce a copy of a valid CITES import permit before an export permit will be issued.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 05 April 2018

for CHIEF EXECUTIVE

Permit Holder

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

PRO CARGO USA
P.O. BOX 60913 AMF
HOUSTON, TX 77205-0913
281/590-5500

CHASE
JPMorgan Chase Bank
Houston Region
712 Main St.
Houston, TX 77002

32-115/1110 316

[redacted] (b) (4)

[redacted] (b) (4)

PAY ONE HUNDRED AND NO/100****

DATE 09/04/2018

AMOUNT ****USD$100.00****

TO THE ORDER OF
USFWS
4401 N. FAIRFAX DR. ROOM 212
ARLINGTON, VA 22203

AUTHORIZED SIGNATURE

Connie McMillan

ACCT # [redacted] (b) (4)

WL2387119 12-15

Details on back. Security Features Included

Form 3-200-20 L

RCVD SEP 12 2018
OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RCVD SEP 12 2018

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

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
SANTA ROSA	CALIFORNIA	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
NA				
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.

Mathieu Kevin Destruel

Signature of applicant/Principal Officer 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: 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.

COPPERSMITH INC.
434 ROZZI PLACE
SOUTH SAN FRANCISCO, CA. 94080

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

MATHieu Kevin Destruel
(b) (6) [redacted]

Jeremy DeJACRUZ
650-872-1225 Ext. 109
JDeJACRUZ@COPPERSMITH.CO.

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. LION PANTHERA LEO

   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:

   NA

   b. Date wildlife is to be hunted:

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

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:

   TANZANIA.
   KIZIGO GAME RESERVE E2. [MANYONI – SINGIDA].
   S. 06.78329°
   E. 034.39873°.

   b. Date wildlife was hunted:

   12. AUGUST. 2018.

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
AFRICAN BUFFALO SAFARI TRACKERS.

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]:
DAR ES SALAAM - TANZANIA.
AFRICAN BUFFALO SAFARI TRACKERS.
P.O.BOX 22758.
DAR ES SALAAM - TANZANIA.

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). See attached

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:
Business Name: AFRICAN BUFFALO SAFARI TRACKERS.
Address: P.O BOX 22758.
City: DAR'ES.SALAAM.
State/Province:
Country, Postal Code: TANZANIA.

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?
NA

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?
NA

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
NA

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: Mathieu Kerwo Hostert Date: 9/6/2018

    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).

ORIGINAL

19759

July 05, 2018 3:47:36 pm

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

MAIN PERMIT

IN.# 3151265

APP: 2010563

GAME HUNTING PERMIT

RETURN DATE: Tuesday, September 18, 2018

PERMIT NO. 2010564

Station DAR ES SALAAM Start Date August 08, 2018 End Date August 28, 2018 Package Type 21 DAYS Extra Days: 0

This RESIDENT'S / VISITOR'S Permit is Granted to MATHIEW KEVIN DETRUEL of Address Passport No. (b) (6)

Who holds Weapon (Type) RIFLE Calibre 416 Maker's No: (b) (6) C.A.R No: -

Licence No: (b) (6) Dated 27-Jun-2018 Issued At Weapon owner & Address MATHIEUI KEVIN

and entitles him to hunt the below animals in the (Game area and blocks) KIZIGO GR E2

owned by AFRICAN BUFFALO SAFARIS TRACKERS LTD

PH GAMSHARD GAMDUST, PH CAT. LICENSE No.

Additional Blocks

Signature of Holder

Signature of Issuing Officer & Official Stamp

Idara ya Wanyamapori DAR

DIRECTOR OF WILDLIFE
05 JUL 2018
P. O. Box 1994
DAR-ES-SALAAM

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	BABOON YELLOW	1	
2	BUFFALO AFRICAN CAPE	3	
3	BUSHBUCK CHOBE	1	
4	BUSHPIG	1	
5	CARACAL	1	
6	CIVET AFRICAN	1	
7	DIKDIK KIRK'S	1	
8	DOVE	5	
9	DUCK	5	
10	DUIKER COMMON	1	
11	ELAND PATERSON'S	1	
12	FRANCOLIN	5	
13	GEESE	5	
14	GENET COMMON	1	
15	GUINEAFOWL	5	
16	HARTEBEEST LICHTENSTEIN'S	2	
17	HIPPO	1	
18	HYAENA SPOTTED	1	
19	IMPALA SOUTHERN	2	
20	JACKAL COMMON	1	
21	KLIPSPRINGER	1	
22	KUDU GREATER	1	
23	KUDU LESSER	1	
24	LEOPARD	1	
25	LION	1	
26	ORIBI COMMON	2	
27	OSTRICH	1	
28	PORCUPINE CRESTED	1	
29	RATEL (HONEY BADGER)	1	
30	REEDBUCK SOUTHERN (COMMON)	2	
31	ROAN ANTELOPE	1	
32	SABLE ANTELOPE ROOSEVELT	1	

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer.
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer.
5. A Professional Hunter conducting a safari must carry his/her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the case of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass.

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOUR
WILDLIFE DIVISION

July 05, 2018 3:47:07

PERMIT NO. 2010564

CLIENT NAME MATHIEW KEVIN DETRUEI

COMPANY AFRICAN BUFFALO SAFARIS TRACKERS LTD

PH NAME GAMSHARD GAMDUST,

PH LICENSE NO

197

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMA

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
ZEBRA BURCHELLS	ONE	K121GO EAST-02	.416	10/08/2018	18:15Pm	M	S 06.66967°	E 034.49253°	268.2cm
SABLE ANTELOPE	ONE	K121GO EAST-02	"	11/08/2018	07:10Am	M	S 06.62898°	E.034.52415°	
IMPALA SOUTHERN	ONE	K121GO EAST-02	"	12/08/2018	08:48Am	M	S.06.61897°	E.034.60455°	
LION	ONE	K121GO EAST-02	"	12/08/2018	17:10Pm	M	S.06.78329°	E.034.51873°	9.7FT Tip to Tail
BRIBI COMMON	ONE	K121GO EAST-02	"	16/08/2018	11:10Am	M	S.06.66263°	E.034.45317°	
BUFFALO AFRICAN CAPE	ONE	K121GO EAST-02	"	17/08/2018	17:34Pm	M	S.06.73936°	E.034.40858°	
HARTEBEEST LICHTEN	ONE	K121GO EAST-02	"	18/08/2018	11:12Am	M	S.06.83316°	E.034.40993°	
DIKDIK KIRKS	ONE	K121GO EAST-02	"	20/08/2018	18:12Pm	M	S.06.67046°	E.034.43429°	
GUINEA FOWL	ONE	K121GO EAST-02	"	22/08/2018	08:31Am	M			
ELAND PATERSONS	ONE	K121GO EAST-02	"	23/08/2018	12:46Pm	M	S.06.79275°	E.034.49179°	
WARTHOG	ONE	K121GO EAST-02	"	24/08/2018	17:22Pm	M	S.06.65477°	E.034.43821°	
JACKAL COMMON	ONE	K121GO EAST-02	"	25/08/2018	17:15Pm	M	S.06.61744°	E.034.61919°	
KUDU GREATER	ONE	K121GO EAST-02	"	14/08/2018	12:15Pm	M	S.06.66852°	E.034.45559°	WOUNDED & LOST

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DECLARATION

We, the above signed persons hereby declare that the register of animal hunted including wounded is a true record of all animals killed or wounded during the validity of the hunting permit

RCVD SEP 12 2018

(b) (6) [redacted]

(b) (6) [redacted]

11-4288/1210 4000

9/10/18
DATE

PAY TO THE ORDER OF U.S. Fish and Wildlife Service $ 100 xx/xx

One Hundred xx/xx DOLLARS

Photo Safe Deposit® Details on back

WELLS FARGO Wells Fargo Bank, N.A. California wellsfargo.com

FOR Cites Permit

M. Kevin Eastridge

(b) (6) [redacted]

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

September 11, 2018

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

RE: Import Application of Zambia Lion Trophy for Derek Yancey

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zambia for Derek Yancey. Also attached to the permit application is the 2018 Operator Enhancement repot from Lumimbia Mwanya-MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Derek Yancey's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 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 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 the attorney, 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: Derek L Yancey

Name: DEREK L YANCEY

Date: 8/22/18

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 13 2018

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

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
YANCEY	DEREK	LeRoy	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Windsor	Colorado	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

08/22/2018

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

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

   John J. Jackson III, Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo 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:

ZAMBIA, MWANYA GMA, MFUWE

   b. Date wildlife is to be hunted:

SEPTEMBER 1-22, 2019

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

MVU SAFARIS LTD
PLOT 2419
FREEDOMWAY,SOUTH END

PO BOX 35225
LUSAKA, ZAMBIA

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). Not yet issued.

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:	SANDO SINKALA SANDO.SINKALA@ZA.STEINWEG.COM
Business Name:	BRIDGE SHIPPING ZAMBIA LIMITED
Address:	VILLA PARK, PLOT 177/178 UNIT C3 LUANSHYA ROAD
City:	LUSAKA
State/Province:	
Country, Postal Code:	ZAMBIA

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?

See data funded by Zambia Authorities.

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?

See operator report attached.

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

See operator report attached.

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: Derek L. Yancy Date: 8/2/18

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).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: **LUMIMBA MWANYA-MVU SAFARIS**

   a. Years in business: **EIGHT YEARS YEARS**

   b. Name of company conducting hunt: **MVU SAFARIS**

   2. Name of concession: **LUMIMBA MWANYA GMA** Size in km²: **1603 KM2**

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **SEVEN YEARS** Can it be renewed? **X** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **NEAREST TOWN IS MFUWE**

   e. If the concession borders a national park, please provide the park name: **SOUTH LUANGWA NATIONAL PARK**

   f. Description of general and distinctive habitat features and any water features: **HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**

3. Are there any communities living in the concession? **X** Yes __ No

   a. If so, estimated number of people or villages in the concession? **ABOUT 400 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **X** Yes __ No

   a. If so, estimated number of people or villages around the concession? **THE POPULATION IS SPARSE AROUND THE GMA**

5. Relevant game populations in the concession:[1]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**ABUNDANT**	**600 AND ABOVE**	**UPWARD**	**PATROL DATA AND OBSERVATIONS**
Lion	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Leopard	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Prey species	**ABUNDANT PREY BASE**	**ABUNDANT**	**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**

6. Total employment number: **__20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS_____**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	EIGHTEEN	EIGHTEEN
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	18	18	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **TWELVE**

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**

   c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**

   d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS**

   e. Description of anti-poaching equipment, vehicles, etc.: **TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**

   g. Do you offer rewards to poaching informants leading to arrest? **X** Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? **X** Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	50,000	43,000	50,000	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	38,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**309,900**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **The meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **_ZAMBIAN KWACHA__**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state. MVU safaris has embarked on a program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

				to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		90,000	135,000	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: **50%**

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: MUHAMMAD SAEED ESSA **Title: DIRECTOR**

MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris, Ltd. has been operating in Mwanya Concession since April 2015. The concession provides habitat for a range of species including Lion, Leopard, Buffalo, Elephant, Hippo, Crocodile, Cookson Wildebeest and Plains Game. The concession is in Eastern Province of Zambia and shares boundaries with three national parks on the west side, northern side and southern side. The area is classified as prime hunting area. Mvu Safaris has entered into a seven year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system. Lumimba Mwanya is about 1603Km Squared.

Our company is a Limited Company whose Directors are Mr. Mohammed Saeed Essa and Mr. Gulam Adam Patel. The Company has been operating in this country for 6 years although this concession was acquired in April 2015. In view of this Mvu Safaris maintains two Hunting Concessions which is Mufunta and Mwanya. Mvu Safaris has one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, twelve anti-poaching scouts, and eight camp staff (cooks, cleaning, miscellaneous). There are about Twenty two Families that are direct beneficiaries from Mvu Safaris employees. These beneficiaries come from the local community.

The Resident Professional Hunter comes from the nearest town called Chipata. We can approximate that more than 200 people benefit from our operations because most of these employees have more than one wife and have a number of dependents who depend on them for survival. We very much appreciate the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy school necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from hunting of Lion and Leopard. With this in mind Mvu Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti –poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

In 2017, Mvu Safaris spent almost $30900 in Mwanya on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 450 liters of diesel for patrol vehicles. We recorded 228 patrol days and well above 1600 patrol hours. We also paid over $3850 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5,900	Directly paid and some subsidies to WA
Scout equipment	5,000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	6,300	For scouts and WA
Rations for WA and community scouts	9,850	
Rewards	3,850	For information and arrests
TOTAL	$30,900	

The concession agreement has a clause which requires Mvu Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2021 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $30900 annually as per agreement which was entered in 2015 by Mvu Safaris, the Community and the Wildlife Authorities. In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. In 2017 we distributed more than 50% to the community.

In the picture above firearms and snares recovered from poachers and surrendered to the Department of National Parks

In the picture above. Elephant Tusks recovered by the Department of National Parks from Poachers in the Luangwa Valley where Mwanya GMA is situated together with surrounding blocks in the Luangwa Valley.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers. In 2017; 3,250 dollars was set aside for compensation purposes in case of such occurrences. We did not have many occurrences of problem animals and just part of the USD 3250 was used for compensation purposes.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $500 to maintain in 2017 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource.

The concession is along the Luangwa River with its smaller streams flowing through the concession creating more water availability for animals. As a result we have a lot of Game in our concession which attracts Lion and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris in Mwanya is still monitoring the population growth of the Lion and Leopard which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mvu Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by positioning cameras in strategic areas so as to monitor the Activities of the Lion and Leopard. Even though our area is rated as a prime area we will work extra hard to grow the population of the Species by at least 15% per year. This will be done by introducing a deliberate approach where only old animals will be harvested for trophies and work on very careful allocated quota utilization per year in the block.

We will also engage the wildlife authorities to regulate resident Hunting by proposing that animals hunted for food purposes should be female so as to balance the Eco system. We further wish to propose that resident hunting should be closely monitored and supervised because we have had reports in the past where resident hunters would not conduct proper ethical hunting methods in the hunting concession where they get allocated hunting rights per year for their own personal hunting opportunities as residents of Zambia and we wish to bring this anomaly to an end.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lion in our area better. As at now we use Lion tracks and foot prints. Sightings by individuals and the cameras which we use annually to monitor the size and age for the Lion.

C. Elephant Hunting

Mvu Safaris does not only limit its Sustainable-Hunting based approach to cats only. We are aware that Elephant is also a high Value Hunting Safari. Recognizing this fact we at Mvu Safaris have a policy which is in line with the wildlife Authorities of not taking Elephant whose tusks is weighing below 15kilograms.

D. Lion Aging Approach

We have been following an age-based policy for African Lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities.

Our approach as a company from 2015 until 2021 when our concession will be due for renewal is to hunt lion which has reached an advanced and mature age only of minimum 5 years and above.

E. U.S. Hunters

Our Largest clientele is from the United States of America. We are happy to report that we have had very good relations with most of these clients who are willing to get out of their way and spend extra in terms of donations to communities and towards Anti-poaching programs. Their approach to Safari Hunting has been that of maintaining high ethics of sustainability so as to improve the numbers of species in these concessions.

CONCLUSION

Mvu Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion/Leopard. Our program helps to preserve and improve available Lion/Leopard habitat. Our anti-poaching program serves to protect and grow the cats prey base and reduces incidental off take by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially Lion) to local communities. Mvu Safaris does not limit is Sustainable use based hunting approach to Cats only but includes other species which are of high value including the African Elephant.Mvu Safaris has anti-poaching awareness campaign programs also which are done through funding sporting activities. This has helped improve the awareness on poaching in the community and how poaching robes them of the much needed finances generated from these natural resources. We can confirm that the communities in our concession are fully aware of the benefits that Safari Hunting comes along with and the dangers that are posed to this resource if poaching is left to escalate at higher levels. The community is now more than willing to bring to our attention any suspicious activities by some members of the communities.

Signed: _____

Operator Name: MUHAMMAD SAEED ESSA

Title: DIRECTOR

SEP 13 2018

(b) (6) [redacted]

78-873/914 561

(b) (6) [redacted]

DATE 8/23/18

USFWS

PAY TO THE ORDER OF $100.00

One hundred & no/

DOLLARS

Great Western Bank

MEMO Derek Kramer app

(b) (6) [redacted]

Jennifer Yancey

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

September 11, 2018

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

RE: Import Application of Zimbabwe Lion Trophy for Todd Fry

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zimbabwe for Todd Fry. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Todd Fry's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev 08/31/2020

RCVD SEP 13 2018

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	1.b. First name	1.c Middle name or initial	1.d. Suffix
Fry	Todd	D.	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Boerne	Texas	(b) (6)		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. 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.

Todd D Fry — 7-25-18

Signature of applicant/Principal Officer 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: 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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

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

   Todd Fry - (b) (6) [redacted]

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 X ____ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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 - Bubye Valley

   b. Date wildlife is to be hunted: 10/22/18 to 11/8/18

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

Mazunga Safaris - Pete Fick. 8 Norfolk Rd. Hillside, Bulawayo, Zimbabwe

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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).

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: PETE FICK
Business Name: MAZUNGA SAFARIS
Address: 8 NORFOLK RD
City:
State/Province: BULAWAYO, ZIMBABWE
Country, Postal Code:

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: Todd D Fry Date: 7-25-18

    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.

All international shipment(s) must be imported 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).

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 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:

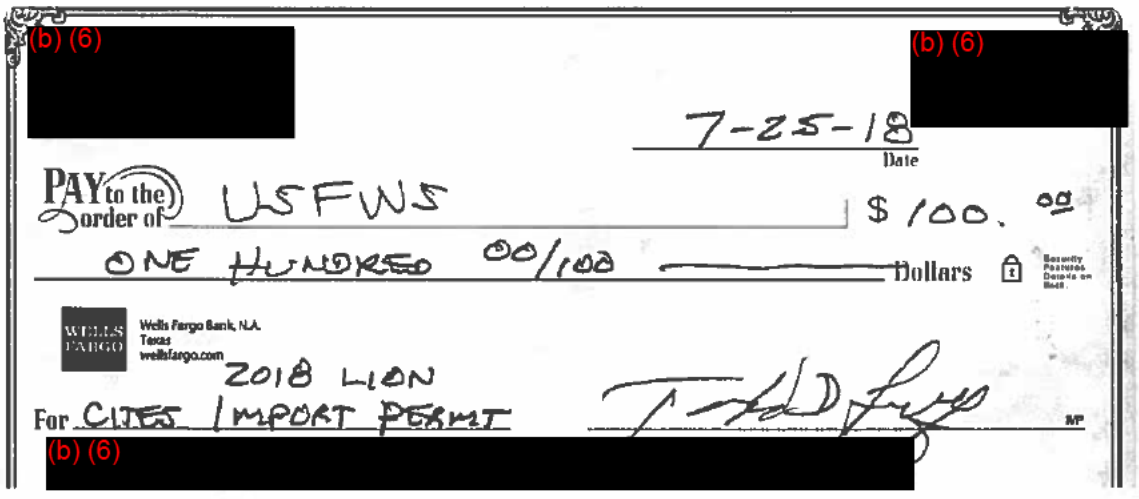
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: Todd Fry

Name: TODD D FRY

Date: 7-25-18

SEP 13 2018


(b) (6)

(b) (6)

7-25-18
Date

PAY to the order of USFWS $ 100.00

ONE HUNDRED 00/100 Dollars

Wells Fargo Bank, N.A.
Texas
wellsfargo.com

2018 LION

For CITES / IMPORT PERMIT

(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G TEER, PH.D.
† BART O'GARA, PH.D.
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September 11, 2018

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

RCVD SEP 13 2018

RE: Import Application of Zambia Lion Trophy for Joseph Dement

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Zambia for Joseph Dement. Also attached to the permit application is the 2018 Operator Enhancement repot from Lumimbia Mwanya-MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Joseph Dement's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

RCVD SEP 13 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III 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 **Lion; Panthera leo** 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 the attorney, 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: **JOSEPH DAVID DEMENT**

Date: **August 13, 2018**

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 13 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DEMENT	JOSEPH	DAVID	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
OAKFIELD	TN	(b) (6)		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
MEDINA	TN	(b) (6)		USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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.

08/13/2018

Signature of Applicant/Principal Officer 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: 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 a trophy 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 4-6 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.

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

Conservation Force, 504-837-1233, cf@conservationforce.org

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lion; Panthera leo

   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:

Country - Zambia; Area - Lumimba Mwanya GMA; Region - Eastern Province of Zambia;
Nearest Town - Mfuwe; Nearest City - Chipata

   b. Date wildlife is to be hunted:

Lion (Panthera leo) hunted in the 2018 hunting season on Lumimba Mwanya GMA in the Eastern Province of Zambia; Scheduled Hunt Dates are October 14 - November 4, 2018

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

Name of Hunting Outfitter/Safari Company - MVU Safaris, LTD.
Name of Professional Hunter - WH van Noordwyk

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

   b. Date wildlife was hunted:

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

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 foreign export/re-export document]:

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). **Lion, Panthera leo, has not been hunted yet and do not currently hold any such permits or licenses, as of the date of this application being submitted.**
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: Sando Sinkala; Telephone: +260 211 847 881 Email: sando.sinkala@za.steinweg.com
   Business Name: Bridge Shipping Zambia LTD
   Address: Villa Park; Plot 177/178; Unit C3; Luanchya Road
   City: Lusaka
   State/Province: Zambia
   Country, Postal Code: 10101
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?
   The area consists of healthy volumes of pride and single males to the extent that the area has successfully harvested 2 mature lion males the past three seasons which made the age limit in Zambia easily, as per the Zambia's law. It is difficult to accumulate exact numbers on c due to their nocturnal lifestyle and and being all over the place covering a vast territory. The area is bordered and situated against the Sou Luangwa National Park, Luambe Park, and Lukusuzi Park which means the hunting block is covered on three sides by National Parks. Lic roam freely between the parks and hunting block making it extremely difficult. However, as an area that is able to successfully harvest two mature males per year, it has a very healthy mature population.

   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, local community, or government?

   Hunting License $900
   Lion Trophy Fee $10,000
   21 Day Lion Safari Daily Rates Total $60,000
   Concession Fee $10,000

   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 landowner that provide a conservation benefit to the species being hunted/species hunted?

   Attached to application in the Conservation Force Operator Enhancement Questionaire and the MVU Safaris, Ltd. Description of Company and Concession, Anti-Poaching Component, Community Participation, Conflict Control, Habitat Protection and Conservation Development and Other Information.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 08-13-2018

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 governments 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 shipments 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).

Memphis, TN
3150 Tchulahoma Rd., Suite #6
Memphis, Tennessee 38118
Phone: (901) 544-3694
Fax: (901) 544-3696
fwsole_memphis@fws.gov

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: **LUMIMBA MWANYA-MVU SAFARIS**

   a. Years in business: **EIGHT YEARS YEARS**

   b. Name of company conducting hunt: **MVU SAFARIS**

   2. Name of concession: **LUMIMBA MWANYA GMA** Size in km²: **1603 KM2**

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **SEVEN YEARS** Can it be renewed? **X** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **NEAREST TOWN IS MFUWE**

   e. If the concession borders a national park, please provide the park name: **SOUTH LUANGWA NATIONAL PARK**

   f. Description of general and distinctive habitat features and any water features: **HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**

3. Are there any communities living in the concession? **X** Yes __ No

   a. If so, estimated number of people or villages in the concession? **ABOUT 400 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **X** Yes __ No

   a. If so, estimated number of people or villages around the concession? **THE POPULATION IS SPARSE AROUND THE GMA**

5. Relevant game populations in the concession:[1]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	ABUNDANT	600 AND ABOVE	UPWARD	PATROL DATA AND OBSERVATIONS
Lion	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Leopard	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Prey species	ABUNDANT PREY BASE	ABUNDANT	UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA

6. Total employment number: __20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS_____

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	EIGHTEEN	EIGHTEEN
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	18	18	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **TWELVE**

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**

   c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**

   d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS**

   e. Description of anti-poaching equipment, vehicles, etc.: **TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**

   g. Do you offer rewards to poaching informants leading to arrest? **X** Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? **X** Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	50,000	43,000	50,000	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	38,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**309,900**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **The meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **_ZAMBIAN KWACHA__**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state. MVU safaris has embarked on a program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

				to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		**90,000**	**135,000**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: **50%**

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: MUHAMMAD SAEED ESSA **Title: DIRECTOR**

PLOT
FREEDOMWAY
IDC BU
P.O. BOX 35225,
TEL/FAX: +26
MOBILE: 0

MVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: m1saeed@hotmail.coml

I. DESCRIPTION OF COMPANY AND CONCESSION

Mvu Safaris, Ltd. has been operating in Mwanya Concession since April 2015. The concession provides habitat for a range of species including Lion, Leopard, Buffalo, Elephant, Hippo, Crocodile, Cookson Wildebeest and Plains Game. The concession is in Eastern Province of Zambia and shares boundaries with three national parks on the west side, northern side and southern side. The area is classified as prime hunting area. Mvu Safaris has entered into a seven year lease agreement with the wildlife authority and communities and is renewable subject to conducting successful conservation records of the Ecological system. Lumimba Mwanya is about 1603Km Squared.

Our company is a Limited Company whose Directors are Mr. Mohammed Saeed Essa and Mr. Gulam Adam Patel. The Company has been operating in this country for 6 years although this concession was acquired in April 2015. In view of this Mvu Safaris maintains two Hunting Concessions which is Mufunta and Mwanya. Mvu Safaris has one resident Professional Hunter who also provides the duties of a Camp Manager. Other employees include four game trackers, twelve anti-poaching scouts, and eight camp staff (cooks, cleaning, miscellaneous). There are about Twenty two Families that are direct beneficiaries from Mvu Safaris employees. These beneficiaries come from the local community.

The Resident Professional Hunter comes from the nearest town called Chipata. We can approximate that more than 200 people benefit from our operations because most of these employees have more than one wife and have a number of dependents who depend on them for survival. We very much appreciate the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy school necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from hunting of Lion and Leopard. With this in mind Mvu Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti –poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mvu Safaris maintains six groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

In 2017, Mvu Safaris spent almost $30900 in Mwanya on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 450 liters of diesel for patrol vehicles. We recorded 228 patrol days and well above 1600 patrol hours. We also paid over $3850 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5,900	Directly paid and some subsidies to WA
Scout equipment	5,000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	6,300	For scouts and WA
Rations for WA and community scouts	9,850	
Rewards	3,850	For information and arrests
TOTAL	$30,900	

The concession agreement has a clause which requires Mvu Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2021 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $30900 annually as per agreement which was entered in 2015 by Mvu Safaris, the Community and the Wildlife Authorities. In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. In 2017 we distributed more than 50% to the community.

In the picture above firearms and snares recovered from poachers and surrendered to the Department of National Parks

In the picture above. Elephant Tusks recovered by the Department of National Parks from Poachers in the Luangwa Valley where Mwanya GMA is situated together with surrounding blocks in the Luangwa Valley.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers. In 2017; 3,250 dollars was set aside for compensation purposes in case of such occurrences. We did not have many occurrences of problem animals and just part of the USD 3250 was used for compensation purposes.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $500 to maintain in 2017 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource.

The concession is along the Luangwa River with its smaller streams flowing through the concession creating more water availability for animals. As a result we have a lot of Game in our concession which attracts Lion and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mvu Safaris in Mwanya is still monitoring the population growth of the Lion and Leopard which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mvu Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by positioning cameras in strategic areas so as to monitor the Activities of the Lion and Leopard. Even though our area is rated as a prime area we will work extra hard to grow the population of the Species by at least 15% per year. This will be done by introducing a deliberate approach where only old animals will be harvested for trophies and work on very careful allocated quota utilization per year in the block.

We will also engage the wildlife authorities to regulate resident Hunting by proposing that animals hunted for food purposes should be female so as to balance the Eco system. We further wish to propose that resident hunting should be closely monitored and supervised because we have had reports in the past where resident hunters would not conduct proper ethical hunting methods in the hunting concession where they get allocated hunting rights per year for their own personal hunting opportunities as residents of Zambia and we wish to bring this anomaly to an end.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lion in our area better. As at now we use Lion tracks and foot prints. Sightings by individuals and the cameras which we use annually to monitor the size and age for the Lion.

C. Elephant Hunting

Mvu Safaris does not only limit its Sustainable-Hunting based approach to cats only. We are aware that Elephant is also a high Value Hunting Safari. Recognizing this fact we at Mvu Safaris have a policy which is in line with the wildlife Authorities of not taking Elephant whose tusks is weighing below 15kilograms.

D. Lion Aging Approach

We have been following an age-based policy for African Lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities.

Our approach as a company from 2015 until 2021 when our concession will be due for renewal is to hunt lion which has reached an advanced and mature age only of minimum 5 years and above.

E. U.S. Hunters

Our Largest clientele is from the United States of America. We are happy to report that we have had very good relations with most of these clients who are willing to get out of their way and spend extra in terms of donations to communities and towards Anti-poaching programs. Their approach to Safari Hunting has been that of maintaining high ethics of sustainability so as to improve the numbers of species in these concessions.

CONCLUSION

Mvu Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion/Leopard. Our program helps to preserve and improve available Lion/Leopard habitat. Our anti-poaching program serves to protect and grow the cats prey base and reduces incidental off take by meat poachers. And our community participation and assistance program demonstrates the potential value of wildlife (especially Lion) to local communities. Mvu Safaris does not limit is Sustainable use based hunting approach to Cats only but includes other species which are of high value including the African Elephant.Mvu Safaris has anti-poaching awareness campaign programs also which are done through funding sporting activities. This has helped improve the awareness on poaching in the community and how poaching robes them of the much needed finances generated from these natural resources. We can confirm that the communities in our concession are fully aware of the benefits that Safari Hunting comes along with and the dangers that are posed to this resource if poaching is left to escalate at higher levels. The community is now more than willing to bring to our attention any suspicious activities by some members of the communities.

Signed: _____

Operator Name: MUHAMMAD SAEED ESSA

Title: DIRECTOR

Mvu Safaris Zambia LTD
PLOT 2414
FREEDOMWAY SOUTH-END
IDC BUILDING
P.O. BOX 35225, LUSAKA-ZAMBIA
TEL/FAX: +260 211 232422
MOBILE: 0977 431148

SEP 13 2018

JOE DEMENT
(b) (6)
MEDINA TN (b) (6)

(b) (6)

8/13/2018
DATE

PAY TO THE ORDER OF U.S Fish and Wildlife Service $ 100.00

One hundred no/100 DOLLARS

Security features included. Details on back.

The Bank of JACKSON
Member FDIC

FOR Joseph David Dement Application

(b) (6)

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 08062D

Vargas, Darcy <darcy_vargas@fws.gov> Thu, Nov 29, 2018 at 5:17 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Dear Conservation Force,

Ref: 08062D for the import of a lion trophy taken by Joseph David Dement in Zambia.

The referenced application has been reviewed and found to be incomplete. Therefore, please reply to the following:

1. According to the referenced application, the lion hunt should have occurred by November 4, 2018. Therefore, please submit a copy of Mr. Dement's hunting license and all related Zambian licenses.

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office by January 13, 2018 (45 calendar days of the date of this letter), your application will be abandoned and administratively closed. Once a file is closed, you will need to submit a new application, and all required fees, for the Service to consider your proposed activity.

Respectfully,

Darcy Vargas
Biologist
US Fish and Wildlife Service
MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
www.fws.gov
www.cites.org

***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**

If you'd like to personalize your own sentence w/ hyperlink, here's the full link: http://visitor.r20.constantcontact.com/manage/optin?v=0016mDWXmlC-eCNJ4wf_4IA3WaTa8IjzcuPb8jWWJtQIDE8kRHO2RaQ17v2A6OUJgeCSOjzrh7ruV2Nz76Ues6ALGcio28DZ6UAnX5e55gpAO4%3D

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0031160

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)

PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 12/10/18 .....

DETAILS OF PERMIT HOLDER

Full name: Dement J. David ..... NRC/Passport No: (b) (6) [redacted] .....

Tel/Mobile No.:..... E-mail address.....

Postal Address: Box 35225 Lsk ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 887 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 470 ..... 2. ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0001368 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Lemimbs .....Game Management Area,

..... Mwanya .....Hunting block for .....days from 14/10/18

to 6/11/18 ..... (Dates inclusive)

Amount Paid..... $150 ..... GRZ Receipt No.....

....

Official Stamp

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
12 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

NPW FORM 7

Original

0001363

REPUBLIC OF ZAMBIA

S/No.: .....

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 of 2015)
THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATIONS, 2007)
Regulation 5(2)
BIRD HUNTING LICENCE

Station of issue: Chulanga Date of issue: 12/10/18

DETAILS OF LICENSEE

Full Name: Dement J. David NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No: ..... E-mail address: .....

Postal Address: Box 35225 Ksl Residential Address: USA

DETAILS OF FIREARM(S)

Firearm Licence No(s) 1: 887 2: ..... 3: .....

Calibre of Firearm(s) 1: 270 2: ..... 3: .....

The above named licensee is authorized to hunt birds of species specified in column 1 except during the seasons specified in column 2.

Common Name (Column 1)	Closed season (Column 2)
Fulvous Whistling Duck	1st January to 31st May
White-faced Whistling Duck	1st January to 31st May
White-Backed Duck	1st January to 31st May
Egyptian Goose	1st January to 31st October
Spur-Winged Goose	1st January to 31st May
Knob Billed Duck	1st January to 31st May
African Pygmy Goose	1st January to 31st May
African Black Duck	1st January to 31st May
Yellow-Billed Duck	1st January to 31st May
Cape Teal	1st January to 31st May
Pintail	1st January to 31st May
Red-Billed Teal	1st January to 31st May
Hottentot Teal	1st January to 31st May
Garganey	1st January to 31st May
Northern Shoveler	1st January to 31st May
Cape Shoveler	1st January to 31st May
Southern Pochard	1st January to 31st May
Coqui Francolin	1st February to 30th June
White throated Francolin	1st February to 30th June
Crested Francolin	1st February to 30th June
Shelley's Francolin	1st February to 30th June
Red-winged Francolin	1st February to 30th June
Red-billed Francolin	1st February to 30th June
Natal Francolin	1st February to 30th June
Hildebrandits Francolin	1st February to 30th June
Swaisons' Francolin	1st February to 30th June
Red-necked Francolin	1st February to 30th June
Common quail	1st October to 31st March
Harlequin Quail	1st October to 31st March
Blue Quail	1st October to 31st March
Crested Guinea fowl	1st December to 3tht April
Helmeted Guinea fowl	1st December to 3tht April

Note: A maximum of six birds to be hunted within 21 days under Non-Resident Hunting.

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND
17 OCT 2018
CHILANGA, ZAMBIA.
PRIVATE BAG

Bird Hunting Licence Fees $100

Application Fees Paid: -

Total Fees Paid $100

GRZ Receipt No: .....

..... Official Stamp

..... Chairperson of the Committee

Note: Original copy to Applicant - Duplicate to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the book

Original

NPW FORM 2

0002187

S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue..... Chilanga Date of Issue..... 17/10/18

DETAILS OF LICENSEE

Full Name..... Joseph D Dement NRC No./Passport No..... (b) (6) [redacted]

Nationality..... USA. Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company: M44 Saf

Certificate of Incorporation No. ..... Date of Incorporation.....

Postal Address..... Box 39225 Lsk Residential Address.....

Firearm Licence/Tourist Firearm Import No..... 887 Calibre of Firearm..... 470

Type of Hunt..... Classic

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Mwamya	2018	4200
			0000143		
/					

Total Animals fees paid - the kwacha equivalent of US$ 4200
Concession Fees paid - the kwacha equivalent of US$ —
Grand Total the kwacha equivalent of US$ 4200

....
Official Stamp Chairperson of the Committee

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
17 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

NPW FORM 12

ORIGINAL

0000276

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: WH van Noordwyk NRC/Passport No (b) (6)

Residential Address: Plot 2414 Freedom Way, Lusaka.

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Muu Safaris.

DETAILS OF CLIENT

Name of client: Joseph D Dement. NRC/Passport No: (b) (6)

Tel/Mobile No..... Nationality: USA.

Postal Address..... Residential Address (b) (6), TN, USA.

Type of Licence: Classic. Licence No.: 000 1160.

Date of Issue: 12/10/18. Place of Issue: Chilanga.

Name of Hunting Block where hunting was conducted: Mwanya.

Hunting period From 14/10/18 To 6/11/18.

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
16/10/18.	Hippo.	M	1		36L 0537077 8571416	✓		
17/10/18.	Puku.	M	1		36L 0537286. 8592086	✓		
15/10/18.	Zebra	M	1		36L 0537810 8511684	✓		
18/10/18.	Lion	M	1		36L 0537[illegible]1984 8588[illegible]4493	✓		
20/10/18.	Buffalo	M	1		36L 0537[illegible] 8593354.	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Hippo		28 3/4 inch.		
Puku		~~16 14~~	16 inch.	
Zebra.				
Lion				14 inch.
Buffalo.			41 6/8 inch.	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 29/10/18 Signature of Client.....

Date 29/10/18 Signature of Professional Hunter.....

Date 29/10/18 Name of Wildlife Police Officer GEOFFREY SAKALA

Employment No. of W.P.O. 00275814

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

NPW FORM 12

ORIGINAL

0000277

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: W H van Noordwyk NRC/Passport No. (b) (6) [redacted]

Residential Address: Plot 2414 Freedom Way, Lusaka.

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Mvu Safaris.

DETAILS OF CLIENT

Name of client: Joseph D Dement. NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No..... Nationality: USA

Postal Address..... Residential Address: (b) (6) [redacted] TN, USA

Type of Licence: Classic. Licence No.: 000 1160.

Date of Issue: 12/10/18 Place of Issue: Chilanga.

Name of Hunting Block where hunting was conducted: Mwanya

Hunting period From 14/10/18 To 6/11/18.

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
23/10/18.	Crocodile	M	1		36L 0378231 8594525	✓		
24/10/18.	Baboon	M	1		36L 0381752 8591551	✓		
25/10/18	Wildebeest	M	1		36L 0407350 8600160	✓		
25/10/18	Grysbuck	M	1		36L 0405710 8579951		✓	
25/10/18	Hyena	M	1		36L 0406450 8601845	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Crocodile	4,26 m.			
Baboon				9 inch.
Wildebeest			26 inch.	
Grysbuck.			1,5 inch.	
Hyena				12 inch.

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 29/10/18 Signature of Client.....

Date 29/10/18 Signature of Professional Hunter.....

Date 29/10/18. Name of Wildlife Police Officer GEOFFREY SAKALA

Employment No. of W.P.O. 00245814

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Vargas, Darcy <darcy_vargas@fws.gov>

Application # 08062D

John J. Jackson, III <cf@conservationforce.org> Wed, Jan 9, 2019 at 3:03 PM
To: "Vargas, Darcy" <darcy_vargas@fws.gov>

Please see the attached License for Joseph Dement.

Thanks

[Quoted text hidden]
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Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org

dement-3-lion.pdf
2811K

SEP 2 7 2018

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

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

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	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Webster	Jason	C	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	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	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Houston	TX	(b) (6)		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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ 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): 3/14/18

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.

      Lion - Leo Melanochaita

   b. Sex (if known).

      Unknown

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: Zambia; Nkala game Management area; Kafile Valley Region; Nearest Town: Itezhi Tezhi; GPS Coordinates of area HQ - S15'54.520' E026'00.233'

   b. Date wildlife is to be hunted:

      July 21 - August 10 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

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: Mike Borman
Business Name: Bangweulu Taxidermy Limited
Address: 4142/K Chifwema Road
Address:
City: New Kasama, Lusaka
State/Province: Zambia
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.

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: 3/14/18

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):

Jason C. Webster
(b) (6)
Houston TX (b) (6)

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):
Jason Webster, (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.

SEP 2 7 2018

JASON C WEBSTER
(b) (6)
RICHMOND, TX (b) (6)

88-1198
1131
63

(b) (6)

DATE 3/14/18

PAY TO THE ORDER OF U.S. Fish & Wildlife Service | $ 100.00

One Hundred and 00/100 DOLLARS

CommunityBank OF TEXAS
www.communitybankoftx.com

MEMO Permit Application

(b) (6)

Management Authority, FWHQ <managementauthority@fws.gov>

[EXTERNAL] Permit Cancellation

2 messages

Rosi Barraza (b) (6) > Tue, Oct 2, 2018 at 11:03 AM
To: "managementauthority@fws.gov" <managementauthority@fws.gov>

Hello,

On behalf of Mr. Webster, please cancel the following permits. As he will no longer be in need of these. Thank you in advance.

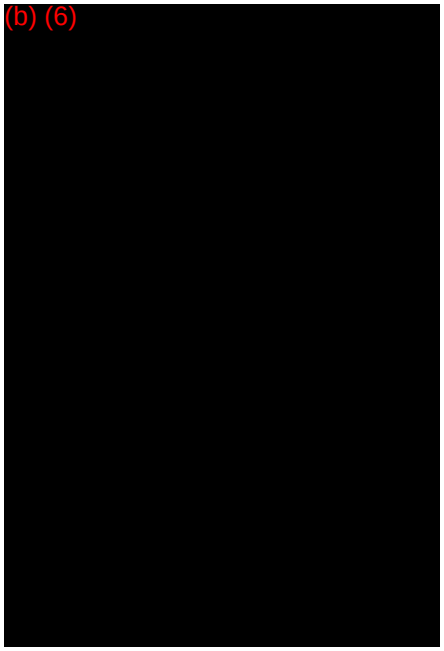
Permit #09896D - Lion

Permit #09897D – Leopard

Sincerely,

Rosi Barraza

(b) (6)



***Please note all invoices MUST be sent to** (b) (6) **and/or** (b) (6) **. or you will not be paid.**

*This email address does not satisfy e-service requirements and is not meant for e-service. Should you need to serve a document in accordance with the Texas Rules of Civil Procedure, please email it to (b) (6)

NOTICE OF CONFIDENTIALITY: The information contained in and transmitted with this email is (1) Subject to the Attorney-Client Privilege; (2) subject to the Attorney Work Product Privilege; or (3) confidential. It is intended only for the individual or entity designated above. You are hereby notified that any dissemination, distribution, copying, or use or reliance upon the information contained in and transmitted with this e-mail by or to any other than the recipient(s) named above by the sender is unauthorized and strictly prohibited. If you think that you have received this message in error please delete it from your inbox folder and from you trash immediately. If possible, please call (b) (6) so that we may address the problem. Thank you in advance for your kind assistance.

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Oct 4, 2018 at 9:39 AM
To: Rosi Barraza (b) (6)

Ms. Barraza,

Thank you for the clarification.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

SEP 2 7 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
GALLMANN	KAREN		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			MATT@GENUSLOGISTICS.C

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ANGELICA	NY	(b) (6)		US

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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): 7/12/18

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 a trophy 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 4-6 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.

   GENUS LOGISTICS / MATT MAYERS 161-15 ROCKAWAY BLVD STE 205 JAMAICA NY 11434 SASE FEDEX INCl

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

   MATT MAYERS 718 790 0216 / MATT@GENUSLOGISTICS.COM

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO MELANOCHAITA , LION

b. Sex (if known). FEMALE

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

FARM GROOTFONTEIN, LEPHALALE SOUTH AFRICA

b. Date wildlife was hunted:

October, 2016

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

MPC BAMBERGER
PO BOX 286
LEHALALE SOUTH AFRICA 0555

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 foreign export/re-export document]:

MPC BARNBERGER / WARTHOG SAFARIS
PO BOX 286
LEPHALALE SOUTH AFRICA 0555

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). PERMIT #014312

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:	
Business Name:	MPC BARNBERGER WARTHOG SAFARIS
Address:	PO BOX 286
City:	LEPHALALE
State/Province:	
Country, Postal Code:	SOUTH AFRICA 0555

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

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, local community, or government?

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 3/2/20

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

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 governments 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 shipments 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).

ORDINARY PERMIT

PERMIT NUMBER: O № 14312

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	PROVINCIAL SERVICE CENTRE ENVIRONMENTAL AFFAIRS LIMPOPO PROVINCE
ADDRESS	
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME	Karen Marie	ID NO.	(b) (6)
SURNAME	Gallmann	PASSPORT NO.	

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b) (6)
ADDRESS		Anvelica
ADDRESS		New York
TOWN		(b) (6)
POSTAL CODE		USA
PROVINCE		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MPC Bambergey
NAME AND SURNAME: RESPONSIBLE PERSON	MPC Bambergey
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Grootfontein 384 LQ
PHYSICAL ADDRESS OF FACILITY	Lephalale
DISTRICT	Waterberg
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (In the case of game farm)	Grootfontein 384 LQ

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(If known)		(If applicable)
Lion	Panthera leo Melanochaita	Female	One (1)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunting — On > Farm Grootfontein 384 LQ, Lephalale Municipality, Limpopo Province

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	Karen Marie Gallmann
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	MPC Bambergey
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	MPC Bambergey
WEAPON AND METHOD OF HUNTING	Rifle 375 H&H, Weatherby

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY | FROM: 28/09/2016 | TO: 28/10/2016

RECEIPT NUMBER 10774902 R100

S. Netshilangani

SIGNATURE OF ISSUING OFFICER:

DATE STAMP:

SIGNATURE OF PERMIT HOLDER:

POWER OF ATTORNEY

Matthew Mayers d/b/a Genus Logistics
76 Albany Blvd. Atlantic Beach N.Y. 11509
Office: (718) 790-0216 Fax: (516) 400-9787 Email: matt@genuslogistics.com

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if the client is an importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such information on a power of attorney executed on or after the effective date of the new rule. These amendments are effective as of September 27, 1982.

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.

Department of the Treasury
U.S. Customs Service Individual
141.32. C.R.

Social Security [redacted] (b) (6)

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, KAREN MARIE GALLMANN

Residing at [redacted] (b) (6) BELFAST NY [redacted] (b) (6) (Full Name)

hereby constitutes and appoints each of the following persons Matthew Mayers dba Genus Logistics

may act through any of its officers or any employees with Power of attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, stead of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or assigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandise; to receive any merchandise deliverable to said grantor;

To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district.

To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise.

To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated said grantor.

To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor.

And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, to which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the foregoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution.

Pursuant to 19 CFR 141.32(a), election is made waiving the right to receive invoices, supporting documents and correspondence from Matthew Mayers dba Genus Logistics, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay Matthew Mayers dba Genus Logistics, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

IN WITNESS WHERE OF, the said (Print Name): KAREN M. GALLMANN

has caused these presents to be sealed and signed: (Signature): Karen M. Gallmann Date: 11/27/15

WITNESS: Diana L. Grastorf Date: 11/27/15

DIANA L. GRASTORF
Notary Public State of New York
Qualified in Allegany County
No. 01GR6090132
Commission Expires 10/30/20 18

SEP 2 7 2018

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK.

(b) (4)

Genus Logistics Inc.
Tel 718 790 0216

Chase
JP Morgan Chase Bank, N.A.
www.chase.com

DATE 09/25/18

PAY **United States Fish and Wildlife Services** $ **100.00

ONE-HUNDRED AND 00/100*******...*** DOLLARS

PAY TO THE ORDER OF
United States Fish and Wildlife Services
5275 Leesburg Pike
Falls Church, VA 22041-3803

Memo GALLMANN PANL IMP PERMIT 12442

(b) (4)

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 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: James Lines

Name: James Lines

Date: April 2, 2018

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD APR 10 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Lines	James	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Colleyville	TX	(b) (6)		U.S.A.

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. 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.

James Lines — April 2, 2018

Signature of applicant/Principal Officer 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: 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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

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

   James Lines (b) (6) [redacted]

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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera, Panthera leo, P. l. melanochaita,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:

   Lower Lupande Game Management Area, Mfuwe, Eastern Province, Luangwa Valley, Zambia

   b. Date wildlife is to be hunted: August 6 - August 13, 2018

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

   WH van Noordwyk

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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). This animal has not been hunted yet.

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: Sando Sinkala
   Business Name: BRIDGE SHIPPING ZAMBIA LIMITED
   Address: VILLA PARK, PLOT 177/178 UNIT C3 LUANSHYA, ROAD
   City: LUSAKA
   State/Province: LUSAKA PROVINCE
   Country, Postal Code: ZAMBIA 10101

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: April 2, 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.

All international shipment(s) must be imported 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).

KWALATA SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: kwalatapeter@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Kwalata Safari Company, Ltd. has been operating in Lower Lupande Concession since April 2002. The concession provides habitat for a range of species including buffalo, lion, hippo, kudu, leopard, elephant, impala, bushbuck, hyena, warthog, zebra, giraffe, and waterbuck. Our concession is about 1511 kilometer squared and is in the South Luangwa Safari Area. Lower Lupande is rated under Zambia Government Legislation as one of the Prime Hunting Blocks in Zambia due to the abundance of wild life and cats. We have a lease with the Wildlife Authority for seven years renewable which started in 2015 after the new allocations of hunting blocks in Zambia with the new Government.

The company is a partnership between Peter Chipman and Zaeed Patel and has been operational for more than fourteen years. We employ three professional hunters, four game trackers, ten anti-poaching scouts and eight camp staff (cooks, cleaning, miscellaneous). Altogether our operations support at least 100 dependents in local villages apart from the local employed camp staff and scouts.

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

II. ANTI-POACHING COMPONENT

Kwalata Safari Company maintains two five-man anti-poaching teams at an annual cost of over $ 25000. Each team is equipped with a four-by-four vehicle, a motorbike, uniforms and boots, tents, rations, and a satellite phone. Our teams closely cooperate with the Wildlife Authority to conduct almost daily patrols of the concession and the border of the South Luangwa National Park. We supply rations at least twice per month to the government game scouts to ensure they are sufficiently equipped for the patrols as well as transport support and more over and above the above mentioned amount per year.

Our contract with the local community requires that part of the revenues paid to the community be used to fund at least six community game scouts, and additionally we supply rations at least twice per month to these scouts.

We heavily patrol our area, conducting approximately one patrol per day by vehicle and foot. In the past year, our teams picked up about 1000 snares, 40 gin traps, and two poisoned licks. Removing snares protects the lion and wildlife population by reducing incidental snaring. Over the past year we arrested more than ten poachers, confiscated three bicycles and five muzzle loaders from them, as well as recovered 14 weapons total. We found two elephant carcasses each having tusks removed, the bones of one impala, some evidence of illegal logging, and a Leopard with a snare wound.

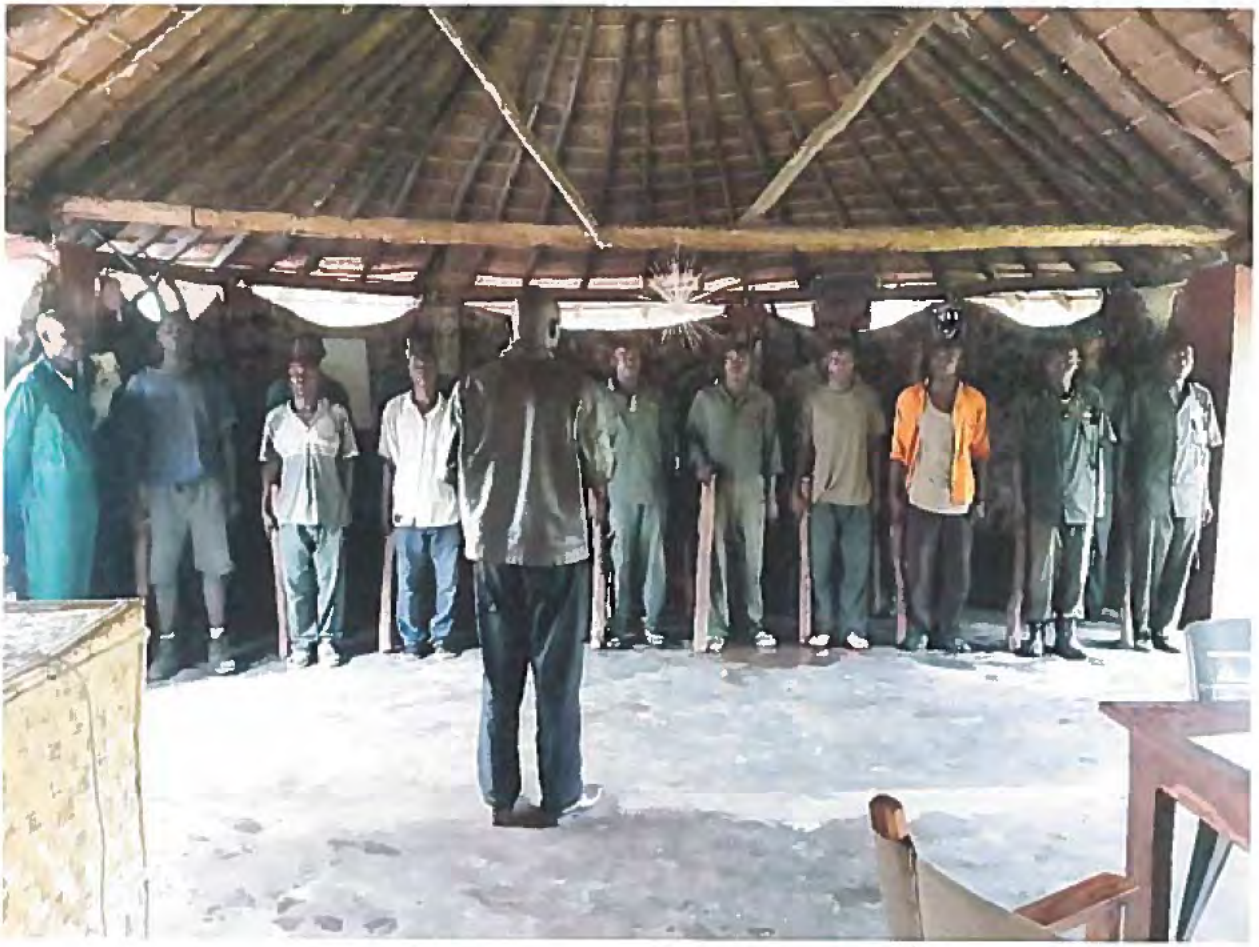
If needed, we subsidize the government game scouts. Every month we provide one week's rations to support a dozen Wildlife Authority scouts and contribute $ 500 in petrol to the Wildlife Authority.

We also send out road crews approximately every two weeks to check the condition of the roads in the concession, to ensure we are able to patrol effectively.

In the picture above wire snares recovered from poachers

In the picture above an elephant which was poached had its tusks removed

In the picture above a Leopard skin recovered from poachers by our vigilant game scouts.



In the picture above our Scouts being prepared to go on Patrols

In 2015 Kwalata Safari Company spent almost $ 57400 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 6000 liters of diesel for patrol vehicles. We recorded 363 patrol days and well above 2000 patrol hours. And made over $ 4200 in payments of rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	18000	Directly paid and some subsidies to WA
Scout equipment	5000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	7700	For scouts and WA
Rations for WA and community scouts	6500	
Micro light rental and fuel	16000	Including time donated to WA
Rewards	4200	For information and arrests
TOTAL	$ 57400	

Our concession agreement requires that we have an anti-poaching program/plan and report about it to the Wildlife Authority. The Wildlife Authority considers our contributions in determining whether to renew the concession.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the two closest villages which are Malama and Kakumbi.

We pledge an annual contribution of at least $ 15000 in projects to each of two villages. And in return ask for a list of preferred projects of witch we develop a work-plan in consultation with village leaders and citizens to fund and supply projects and require a measure of community contribution to each project either through a council donation or more frequently, through donations of time by workers. In 2015 we funded and supplied the following projects at each village's choice:

Village	Projects	Amounts (USD)
Village 1	Renovations of schools	18100
Village 2	Designing and constructing village office	3100
	Funding youth sports league including transport	1900
	Providing new equipment for village game scouts	800
	Paying teacher salary and school fees for poor children	6100
	Digging new borehole and building pump station	3500
		15400
	TOTAL	$ 33500

In addition to these direct contributions, we pledge to distribute at least 50% of game meat harvested to the villages. The villages have the choice to eat the meat or sell it. In 2011 the value of this meat was $ 30000. 2012 the value was $ 33000. 2015 the value was $ 27500.

Our concession agreement requires we have a community assistance program/plan and report on the program to the Wildlife Authority. The Wildlife Authority considers these contributions in determining whether to renew our lease.

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. We also maintain an approximately $ 12000 fund of client donations which we use for community compensation. In 2015 we received 82 reports of problem animals and we made it through the entire season without a problem animal kill. We paid out $ 2650 in compensation for lost livestock and crops.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have enhanced water infrastructure for wildlife in our concession by maintaining four pans to increase water supply and carrying capacity of the concession which gives allot of Antelope Species for Lion/Leopard food chain and habitat for their sustainable and healthy survival.

V. OTHER INFORMATION

A. Prey Base

Kwalata Safari Company's anti-poaching efforts, water provision, and fire management have allowed the lion prey base in our concession to grow over the past five years. We estimate that our Buffalo and Plains Game populations have shown an increase of 15-20% per annum. In 2014 our Wildlife Authorities flew over the Game Management Areas in a large-mammal survey and counted more than 1000 buffalo on average.

B. Lion Population Tracking

Lion are notoriously difficult to survey or census. To track the lion population trend in our concession, Kwalata Safari Company maintains a lion sightings record in form of camera pictures taken as well as trail camera pictures, sightings, spoor and footprints on individual, groups and passing through cats. Because we keep tabs on the lion in our concession, we are assured that the regulated, limited off take is sustainable. Our wildlife Authorities have also provided us with a data recording sheet to use on all Lion/Leopard Safaris as off 2015 to take record of sightings and record the activities on the specific safari being done. We have a 100% success on all our hunts.

C. Lion Aging Approach

Kwalata Safari Company has been following an age-based policy for African lion trophies since 2015, when we adopted this Policy after a mutual agreement with our wildlife Authorities and to be conservative in estimating age.

As a result of this, Lions have been passed up by a number of potential Lion before allowing a client to harvest a specimen that we have any doubt is of on age. We also don't allow any client to shoot a lion of which there is any doubt on the age limit if the lion looks anything less than 5 years of age but rather try and shoot a lion that looks more the like of more than 6 years of age.

In 2016, we successfully harvested mature (aged six or older) male lion up to our quota (of two). We have been able to harvest our full quota this year because our selectivity has resulted in more lion reaching an advanced age.

D. ELEPHANT HUNTING

Our Wildlife Authorities have put up a policy not to Harvest any Elephant that has its tusks weighing less than 15 kilograms. In view of this our Professional Hunters are instructed to not harvest an Elephant with weight in tusks of less than 20 kilograms at a minimum and to be very selective when Hunting Elephant by ensuring that they comply with this agreement. The wildlife authorities have put up stringent measures to any Professional Hunter who goes against this rule which may even include withdrawing his Professional Hunting License.

E. U.S. Hunters

Most of our clients 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

Kwalata Safari Company's regulated, confirm that our sustainable-use based hunting program enhances the survival of the Lion and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: _____

Operator Name: Kwalata Safaris © LTD

Title: DIRECTOR

[redacted] (g) (6)

32-61/1110

[redacted] (g) (6)

DATE 4-1-18

PAY TO THE ORDER OF U.S. Fish & Wildlife Service $ 100 00/xx

One hundred dollars and 00/xx DOLLARS

CHASE

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-85336C

Enhancement Finding
Applicant: James (b) (6) Lines (PRT-85336C)

James (b) (6) Lines submitted an application on April 10, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken August 6, 2018, through August 13, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth

a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the

current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Lines' application involving a *P. l. melanochaita* sport-hunted trophy taken in the **Lower Lupande GMA**, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently

facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Lines' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.,* by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Lines', participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Lines' application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016). In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion

populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an individual or local community. They are buffered by GMAs. DNPW issues annual non-resident

hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Lines' hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Lines will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Lines, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Lines.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to her to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Kevin (b) (6) Lines.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Chief
Branch of Permits
Division of Management Authority
6/8/18

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LION ZAMBIA ESA TROPHY

Permit Number: MA85336C-0

Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JAMES (b) (6) LINES
(b) (6)
COLLEYVILLE, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2018 hunting season.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 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).

RCVD OCT 16 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Somers	Scott	Ross	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Davison	Michigan	(b) (6)		U.S.A.
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** 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)

10/03/2018.

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 a trophy 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 4-6 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.

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

Scott Somers (b) (6) [redacted]

3. 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?

☒ 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.

4. 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

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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Zimbabwa / Save Conservence / Chishakwe Ranch / Masvingo Province

   b. Date wildlife was hunted:

6/9/2018

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

John Greeff, PH No. 127 (14 Clark Road Suburbs, Bulawayo, Zimbabwe)
Passing Cloud Safaris T/A Pro Safis Africa 20 Haddon Avenue, Khumalo, Bulawayo, Zimbabwe

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 foreign export/re-export document]:

Out Bound Cargo Trophy Exporters
5 Grantham Road Belmont, Bulawayo, Zimbabwe

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).
Special License Attached

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:	
Business Name:	Out Bound Cargo Trophy Exporters
Address:	5 Grantham Road
City:	Belmont
State/Province:	Bulawayo
Country, Postal Code:	Zimbabwe

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Yes. Attached Lion Management Plan

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, local community, or government?

Trophys Fees listed on Hunting Return Form TRA52
Also see "Pro Safaris Africa & Documentation

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

See Lion Management Plan

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 10/03/2018.

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 governments 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 shipments 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).

Passing Cloud Safaris
t/a Pro Safaris Africa
ZIMBABWE

17 September 2018

US Fish and Wildlife

RE - SUPPORTING DOCUMENTATION FOR LION IMPORTATION– MR SCOTT ROSS SOMERS

This letter serves to confirm that the Mr Somers hunted with Pro-Safaris Africa on Chishakwe Ranch within the Save Valley conservancy in south east Zimbabwe.

Chishakwe ranch is 100% dependant on hunting income. Earnings from the hunts conducted for the 2018 season to date is $168,964.50 (One hundred and sixty eight thousand, nine hundred and sixty four dollars and fifty cents).
Of this amount the Lion portion is 23% of the value, which is $38,861.84 (Thirty eight thousand, eight hundred and sixty one dollars and eighty four cents only).

The money is spent on the management of the area. This includes staff wages, anti-poaching, water pumping, road maintenance, pipeline maintenance, security and general area maintenance.

Chishakwe employs 32 staff members with 210 Dependants in total.

There are six water points that are pumped from a dam within the ranch with approximately 45km of pipelines that need to be maintained.

Chishakwe receives one Lion tag and this hunt contributes 23% of total income. Losing the Lion tag has devastating implications for the sustainability of the area.

Lion in Zimbabwe have to be of 5 years or older of age. This is well documented.

For any further details, please don't hesitate to contact us.

Sincerely Yours

Louis Muller
Managing Director
Pro Safaris Africa

No 3 Aida Court, Windsor Park Complex, Famona Bulawayo, Zimbabwe
☎: +263-9-71368/9, E-Mail: info@pro-saf.com

ALL ADDRESSING QUESTION 7 ALSO QUESTION 9

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4754/2018

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

Permit/Certificate No ZW/4754/2018

[X] Export
[ ] Re-Export
[ ] Import
[ ] Other

Original

2. Valid Until: 25-01-2019

3. Importer (name and address): SCOTT R SOMERS

(b) (6) [redacted]

DAVISON
MI (b) (6)
U.S.A

3a. Country Of Import: United States Of America

4. Exporter (name, address and country Zimbabwe
PRO SAFARIS
P.O.BOX AC 577 ASCOT
BULAWAYO
ZIMBABWE

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no.: 129647C

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convention contained in the *Statutory Instrument 76 of 1998*, for the purpose of Exporting / Re-exporting / Importing the Wildlife listed below
The total value of this consignment is:
$US .....Signature of applicant.....

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Giraffa camelopardalis	Giraffe	[illegible]	NE W	1 no	n/a	n/a	n/a
Panthera leo	lion	[illegible]	II W	1 no	n/a	n/a	n/a
Panthera leo	lion	full mount skin	II W	1 no	n/a	n/a	n/a
Equus burchelli	Zebra	skins (for [illegible]	NE W	2 no	n/a	n/a	n/a

12. Country of origin	Permit No	Date of issue	12a. Country of last re-export

PERMITS DIVISION
ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
P.O. BOX 2283, BULAWAYO
TEL: 09-240016 FAX: 09 883386

13. This permit is issued by

Place: Bulawayo Date: 25-07-2018 Security stamp, signature and official seal:

14. Exchange Control Information
CD1 number.....for
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official):.....
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority/Inspector

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity

17. Bill of lading/Air waybill number:

Port of export Date Signature

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4753/2018
NP CITES FORM 2

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

Permit/Certificate No ZW/4753/2018

- [X] Export
- [ ] Re-Export
- [ ] Import
- [ ] Other

Original

2. Valid Until: 25-01-2019

3. Importer (name and address): SCOTT A SOMERS
[redacted]
DAVISON
MI[redacted]
U.S.A

4. Exporter (name, address and country Zimbabwe
PRO SAFARIS
P.O. BOX AC 577 ASCOT
BULAWAYO
ZIMBABWE

3a. Country Of Import: United States Of America

5. Special Conditions
For live animals this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

5a. Purpose of transaction (see reverse): H

5b. Security stamp no. 1246489

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY 140
Causeway
Harare, Zimbabwe

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convention contained in the Statutory Instrument 76 of 1998, for the purpose of Exporting / Re- exporting / Importing the Wildlife listed below
The total value of this consignment is:
SUS 12,225.00 Signature of applicant

7. Scientific Name	8. Common Name	9. Description of specimens including no. (age/sex if live)	10. Appendix and Source (see reverse)	11. Quantity (including unit)	11a. Total exported quota	11b. Tag Number	11c. Mark
Syncerus caffer	Buffalo	backskin	NE W	1 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	feet (front	NE W	2 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	skin pieces (cape	NE W	1 no	n/a	n/a	n/a
Syncerus caffer	Buffalo	skulls	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	backskin	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	skin pieces (cape	NE W	1 no	n/a	n/a	n/a
Taurotragus oryx	Eland	skulls	NE W	1 no	n/a	n/a	n/a

12. Country of origin	Permit No	Date of issue	12a. Country of last re-export	Certificate No	Date

13. This permit is issued by

Place: Bulawayo Date: 25-07-2018 Security stamp, signature and official seal:

ZIMBABWE PARKS & WILDLIFE MANAGEMENT AUTHORITY
21 AUG 2018
WESTERN REGION
P.O. BOX AC 577 ASCOT BULAWAYO
TEL.: 09 - 74000 FAX: 09 883386

14. Exchange Control Information
CD1 number ..... /or
CD1 not applicable to export (delete)

(Date stamp and signature of authorized official): .....
Note: Permit/certificate invalid unless this section is completed.

15. Date Stamp of Zimbabwe Revenue Authority

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity

17. Bill of lading/Air waybill number:

Port of export Date Signature

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000080362
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	PASSING CLOUD SAFARIS T/A PRO SAFARIS AFRICA	Client's Full Name	Scott Ross Somers
ZTA (HOP) No.	HOP0012	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	20 HADDON AVENUE KHUMALO BULAWAYO	Address	(b) (6) Davison M (b) USA
Name of Professional Hunter	JOHN GREEFF	Licence No.	127
Telephone		Fax	N/A
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	OUTBOUND CARGO & TROPHY CONSULTANTS	Address	5 GRANTHAM ROAD ,BELMONT ,BULAWAYO
Name of Shipping Agent		Address	
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chishakwe	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	05-06-2018
Date of Safari To	19-06-2018
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	1,500.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	12,000.00
Other fees (incidentals)	7,995.00	Grand Total USD	21,495.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Chishakwe	S2016839	09-JUN-2018		5,500
2	GIRAFFE	M	Killed	Chishakwe	S2016990	07-JUN-2018		900
3	ELAND	M	Killed	Chishakwe	S2016280	11-JUN-2018		1,000
4	BUFFALO	M	Killed	Chishakwe	S2014922	11-JUN-2018		3,000
5	ZEBRA	M	Killed	Chishakwe	S2015391	06-JUN-2018		800
6	ZEBRA	M	Killed	Chishakwe	S2015862	07-JUN-2018		800
7								
8								
9								
10								
11								
12								
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28								
29								
30								

ALSO QUESTION 9

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05)
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

AUTHORISED
0000080362
SUBMITTED 29/05/2018

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	PASSING CLOUD SAFARIS T/A PRO SAFARIS AFRICA	Client's Full Name	Scott Ross Somers
ZTA (HOP) No.	HOP0012	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	20 HADDON AVENUE KHUMALO BULAWAYO	Address	(b) (6) Division (b) (6) USA
Name of Professional Hunter	JOHN GREEFF	Licence No.	127
Telephone		Fax	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist		Address	
Name of Shipping Agent		Address	
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chishakwe	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	05-06-2018
Date of Safari To	19-06-2018
Daily Rate Charged For Big Game USD	150.00
Daily Rate Charged For Plains Game USD	150.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	Total Guests rate
Less Commission	Total Trophy fees
Other fees (incidentals)	Grand Total USD
Percentage Commission Charged	Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	K	CHISHAKWE		6/6/2018	BAIT	
2	ZEBRA	M	K	"		6/6/2018	-	
3	ZEBRA	M	K	"		8/6/2018	-	
4	GIRAFFE	M	K	"		7/6/2018	-	
5	LION	M	K	"		9/6/2018	1"	
6	BUFFALO	M	K	CHISHAKWE		11/6/2018	100"	
7	ELAND	M	K	CHISHAKWE		11/6/2018	90"	
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

Foreign Client

Signature of Professional Hunter

Signature of Safari Operator

Invoice Amount

I, SCOTT SOMERS, hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date 6/14/2018.

Signature of Professional Hunter _____ Date 14/6/2018

Signature of Safari Operator _____ Date _____

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 21 May 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Passing Cloud Safaris who have applied for permit to hunt 1 x lion with client Scott Ross Sommers in the following property:

- Chishakwe in Save Valley Conservancy Masvingo Province **from 5 June 2018 to 19 June 2018.**

The hunt will be under the guidance of professional hunter John Greeff PH license #127.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~..... 21/05/18.

Investigation and Security Manager **Date**

Approved/ ~~Not Approved~~: 21/05/18

Herd Management Services **Date**

Parks and Wildlife Management Authority
MANAGEMENT SERVICES CONSUMPTIVE
23 MAY 2018
HEAD OFFICE
P. O. BOX CY 140 CAUSEWAY HARARE
TEL: (04) 707 [illegible]

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Parks and Wildlife Management Authority
ISSUED IN TERMS OF CHAPTER 20:14 TO:
MANAGEMENT SERVICES CONSULTANTS
JOHN GREEFF NO: 127
VALID UNTIL 31 DECEMBER 2018
MAR
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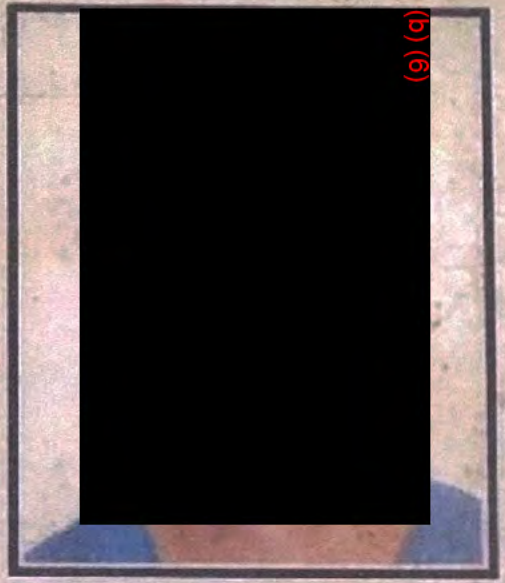
JOHN GREEFF

Professional Hunter

Licence No: 127 Y.O.I. 1999



I.D No:- [redacted]

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Class:- 4,5

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AUTHORIZED TO CARRY FIREARMS

The Savé Valley Conservancy Lion Management Plan, 2011

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Executive summary

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land, and where due to the protection afforded, are increasing in numbers. Although increases are typically a desired management outcome, inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives, necessitating population control measures. Population control of lions does, however, often create management dilemmas as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference the measures typically employed to control lion populations include a) translocation of subadults to new reserves, b) contraception of breeding lionesses, c) culling (including trophy hunting), and d) social manipulation.

All of these management options require a degree of population monitoring, which is often more costly than the management intervention itself. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals to be reintroduced into. Thus translocation, although useful, is not likely to remove sufficient lions to be

considered as a key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and the manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation.

As the numbers of lions in many southern African reserves have reached saturation, now days many reserves are faced with the need to cull lions. Typically this is achieved through the shooting of excess independent subadults, male coalitions, and occasionally lionesses from prides. The latter option is problematic in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough for more natural population regulation mechanisms to be applied, but these can be simulated on most. Logically population control methods that simulate natural processes are likely to produce the most desirable outcome, with the minimum intervention, and thus minimum social disruption. Social disruption *per se* is a fourth population management approach the can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves.

Thus although all feasible approaches to lion population control should be investigated, currently culling, ideally as a trophy hunting exercise, is the most suitable option for the Savé Valley Conservancy. However, the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach. To date the aim for trophy hunting lions in the conservancy has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth.

The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth. Using this premise lion hunting in the conservancy could be manipulated in the following ways to maximise hunting returns while effectively limiting population growth:

1. Hunting male lions at an age threshold that will stabilize population growth

Although infanticide by adult male lions can increases the risk of population extinction, trophy hunting can be sustained simply by hunting males above a minimum age threshold. This strategy can maximize both the quantity and the quality of the long-term kill. Thus any

male older than five years of age can be safely hunted without negative effects on the population. This is proposed as the key lion population management tool to be employed in the conservancy.

2. Hunting males out of male coalitions that are large or defend key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age. But males $\geq$ 7-8 years of age are the most suitable age class for high quality trophies. However, in certain circumstances very large coalitions acquire territories at 4-5years of age. These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

3. Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies, it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates to possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems. For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management.

4. Hunting older females from key prides

Although it has been reported in the literature that hunting lionesses can lead to population declines, there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights. But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours. Thus females to be hunted should be selected from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo tourism objectives. Dominant prides typically occupy territories including multiple river intersections and have large resident herds of buffalo.

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota, and that some lionesses are additionally placed on quota. This should equate to a male quota of at least eight males, and 3-5 females, per year. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key

demographic patterns. The off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via spoor counts, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported by the conservator on annual basis.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

Problems with the implementation of any lion management plan, however, include the fact that lions are difficult to census and available techniques are prone to statistical problems. These issues of population monitoring can be resolved in four ways with increasing levels of certainty and cost, from surveys of landowners and managers to get estimates of population size and structure, to long-term direct monitoring. It is proposed that manager surveys (manager estimates) and track frequency estimates are conducted annually, and that the call-in survey conducted in June/July 2011 be repeated in 2015. However, it is also important to secure funding for long term direct monitoring. Additionally careful monitoring of hunted lions should be mandatory (see Appendix 1). Based on the respective recent surveys there currently seem to be about 170 lions in the conservancy, as detailed in the table below.

Survey method used	**SVC lion population estimate**
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

An additional concern is the management of livestock predating lions. Although more comprehensive details are presented in the plan, the two key issues to address with all stakeholders to reduce conflict are that:

a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators).
b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

All livestock predation events should be well reported and any interventions should follow a protocol best established in a work shop process with all stakeholders involved. While habitual livestock killing lions might best be destroyed, this should only be done when other mitigation measures have been attempted, and should not be used as a trophy hunting opportunity. Thus all destruction of problem lions should be undertaken by conservancy members and staff.

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1. Introduction

Lions are a powerful cultural symbol of Africa, and an important indicator of an area's wildness. Lions are also a key species for photo-tourism, safari trophy hunting, and research. As a key member of the Big Five they form an integral component of the classical African hunting safari. However, lions are increasingly threatened, with much of their former range now lost. Where lions still survive, they can be a major predator of domestic livestock, presenting challenges and hardship to those who live amongst them. Thus whilst lions are a major source of economic benefit being one of Africa's most important tourism attractions, they can also be an economic and dangerous liability.

In 2002 the Zimbabwe lion population was estimated to be between 1,000-1,700 animals (Chardonnet 2002, Bauer and Van der Merwe 2004,) with an estimated range of c. 90,000 km^2. However, to date information on population status, current distribution and trends still remain lacking for most major wildlife areas in Zimbabwe, although there are estimates of numbers for some areas. Lion specific surveys and research have largely been limited to national parks and wildlife estates, notably Hwange National Park, the Matetsi Safari Area in northwest Matabeleland, and Mana and Matusadona National Parks in the Zambezi Valley (Monks 2005). In the south-east lowveld lions have been monitored in different areas using a combination of track frequency counts, call-in surveys, and direct monitoring. Track surveys have been conducted in Savé Valley Conservancy from 2007-2010 (Groom 2008-2010). Call-in surveys have been conducted in Gonarezhou National Park (Groom & Funston 2010, Groom & Funston in prep) and sporadically in Savé Valley Conservancy from 1996 to 2007 (Pole 1999; Pole 2003), and lions have been directly monitored in Malilangwe.

Previously in this region lions were largely extirpated by cattle ranchers and until quite recently were only resident in and around Gonarezhou National Park. They did, however, re-colonise the Savé Valley Conservancy in about 2000, and have been increasing ever since. The recent rate of recovery has fuelled concerns about the impact on various ecological and economic processes, necessitating a comprehensive management plan with appropriate options.

1.1 Savé Valley Conservancy

During the 1980s and 1990s game ranching developed as a major land use in the south-east Lowveld of Zimbabwe. In several areas, ranchers cooperated to form large collaboratively-managed wildlife areas, or conservancies. The most notable example of this was the 3,450 km^2 Savé Valley Conservancy, created in 1991 from 18 former cattle ranches (Figure 1). The natural land cover is deciduous woodland savanna dominated by *Colophospermum mopane,* Acacia-Combretum woodland and *Acacia tortillis* woodland (Pole 2004). Following a bad drought in 1991/1992, most of the conservancy's cattle were removed and the focus shifted

to development of multi-use wildlife production systems based on high quality tourism (Pole 1999). All internal fences were removed and a double 350 km perimeter game fence was constructed around the perimeter of the conservancy. Today, the conservancy comprises 23 individual properties, constituting 18 management units.

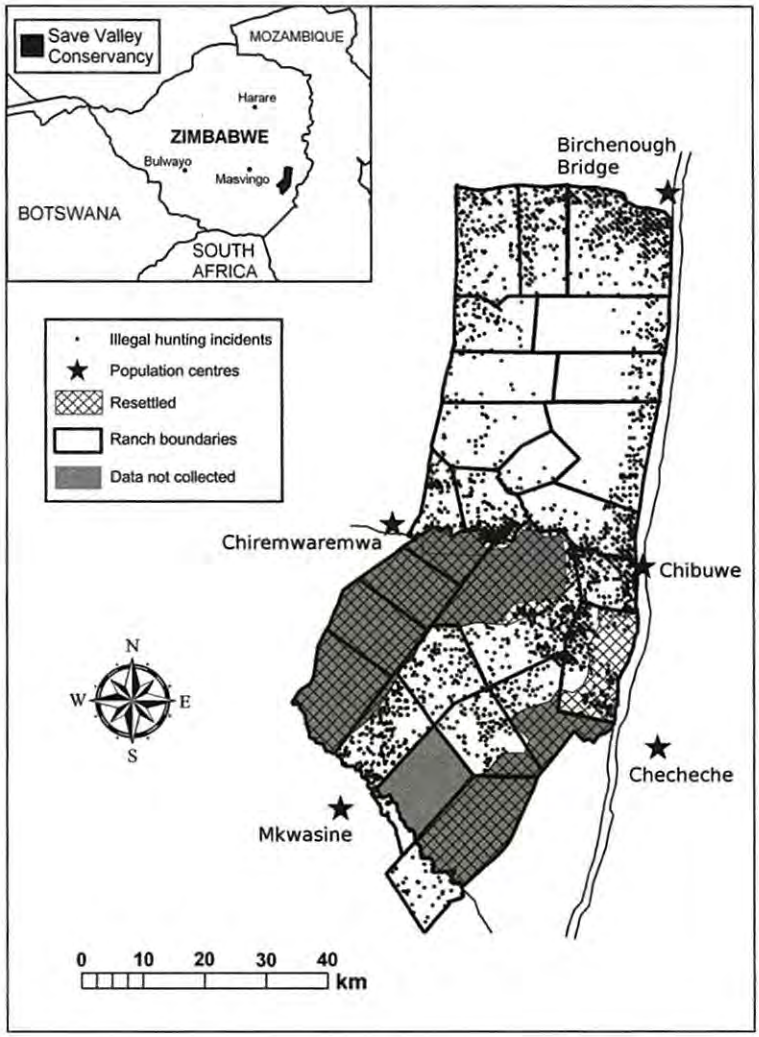

Figure 1. Map of the Savé Valley Conservancy highlighting settled land and the distribution of illegal hunting incidences from 2005 to 2009 (from Lindsey *et al.* 2010)

Prior to the development of the area for cattle ranching in the 1920's, the Savé Valley was one of Zimbabwe's major wildlife refuges (Pole 1999). To facilitate the development of the cattle ranching industry, however, almost all predators and most large herbivores were virtually eradicated. This included wild dogs, lions, cheetahs and spotted hyenas, with leopards managing to exist at reasonable densities (du Toit 1994, Pole 1999). When the conservancy was formed, 3,950 animals of 14 species were reintroduced and a security system was established, including ranch-based anti-poaching teams to control illegal

hunting. Wildlife abundance and diversity increased rapidly during the 1990s, as did financial returns from photographic tourism and safari trophy hunting (Lindsey *et al.* 2008). Since the formation of the wildlife conservancy, however, predator numbers have increased, largely through natural recolonization (although 13 lions were reintroduced between 1995 and 2005). Nonetheless, and despite no eradication attempts since 1991, lion and spotted hyaena densities in the conservancy remained low for several years (see Pole 1999), and only began increasing significantly in 2007/2008.

The conservancy's positive development trends were, however, reversed in 2000-2001 with the onset of national land reform in Zimbabwe. Nine properties in the south of the conservancy (comprising 33% of the total land area) were settled by subsistence farmers, and approximately 80 km of 2m twin perimeter game fences was removed. Properties in the north of the conservancy were not settled. The settlement process coincided with the onset of large scale illegal bushmeat hunting (Lindsey *et al.* 2010).

1.2 Lion Population Recovery in the Savé Valley Conservancy

The initial recolonization of lions in the Savé Valley Conservancy remains sketchy. However, records from Sango Ranch (Dusty Joubert, *unpublished data*) reflect the pattern the process is likely to have taken in much of the conservancy:

"Lion tracks were first recorded on Sango in April 2000. The first records all seemed to be of males, with three males observed during 2001. By the end of 2002 the tracks of five male lions were known, but as yet no females had been identified. However tracks of female lions were recorded in the Bedford Block in 2003. In 2003 a male and female lion were recorded on Mokore Ranch. This lioness was reported with cubs on Mokore in 2004. On 18 August 2005, ten lions (4 lionesses, 6 small cubs) were captured at Malilangwe Conservancy and released on Sango Ranch. These lions remained for approximately two weeks in the Chanurwe hill area, and were driven away by a male and female lion that was now moving regularly along the B-line. The newly released lions moved to Chisangaurwe hill where they would hide in the day and hunt in the Savé River area during the night. On 18 November 2005 two of the 10 lions were found dead in snares with a third lion that had broke the snare. This had a devastating effect on the pride with the remaining lions splitting up. It is not clear how many lions survived but it seems from sightings and track records that three adult females and one cub remained. Over the next few years the lions on Sango increased to about 10 individuals by 2007.

In April 2007 a lion monitoring census was conducted throughout in the conservancy. Two methods were used to determine the number of lions in the area. The first being the call-up method with a tape played of a dying buffalo calf, while the second was a track count

survey. On 7 May 2007 tracks of two male, three female and two-three cubs were seen at B3-trough (C10) and were named the Makonde pride. By September 2007 it was estimated that the lion population on Sango stood at about 24 lions."

Track index surveys conducted from 2007 to present indicate that lions in the conservancy are currently undergoing exponential population increase (Figure 2, Groom 2008-2010). It is thus clear that the numbers of lions are increasing rapidly, and may yet double in numbers before reaching equilibrium. Financial assessments suggest that this would not be a viable situation (Funston, Groom & Lindsey *in prep*) and thus some population control mechanisms are desired by the landowners. This could be effectively achieved through trophy hunting, although some consideration may need to be given to the large female segment of the population.

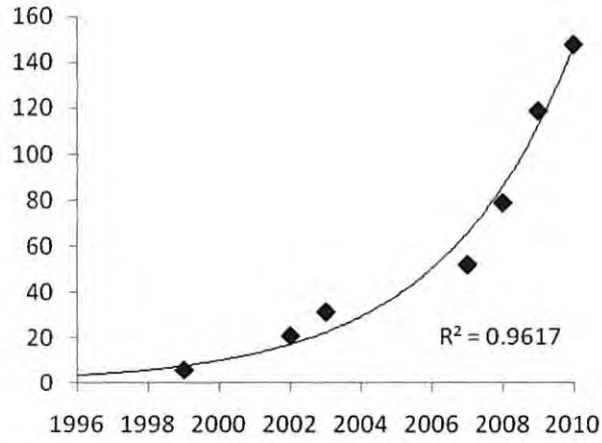

Figure 2. Rate of increase of lions in the Savé Valley Conservancy from 1996 to 2010 as determined by call-in and track index surveys. Average growth rate is $35\%^{-year}$

1.3 Background to Conservation and Modern-Day Trophy Hunting of Lions

Large carnivore species, including lions, are becoming increasingly threatened in Africa, especially when not protected in large conservation areas (Woodroffe & Ginsberg 1998). Fortunately, the popular appeal of charismatic carnivores such as lions has often led to the conservation of habitat that sustains a host of other species. In southern Africa, game reserves and game ranchers recognize the importance of maintaining lion populations and in some game reserves lion populations have been re-established to attract tourists and hunters (Anderson 1981, Mills 1991, Van Dyk 1997, Hunter 1999, Hoare & Williamson 2001, Funston 2008).

Photo-tourism and safari trophy hunting are two industries that have developed to create revenues whilst maintaining wildlife and wild lands. Although these industries differ considerably in their use of wildlife, it is clear that both can help to maintain parks, reserves,

wildlife, and the communities around them (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Although photo-tourism is generally perceived as less invasive, and therefore seems more in line with conservation efforts, hunters spend substantially more money towards their safaris and generate high revenues that can be used to support wildlife conservation (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Due to political instability safari trophy hunting, and meat sales from shot animals, currently generates most income in the Savé Valley Conservancy, although some landowners have expressed interest in attempting to shift their economic activities towards photo-tourism.

In Africa, safari trophy hunting generally occurs in areas not suitable for other livelihoods, such as farming or photographic tourism, and generates considerable revenue for land that would otherwise be considered of marginal value (Kiss 1990). The wealthy foreign elite have continued to demonstrate "willingness-to-pay" for the opportunity to hunt. If harnessed responsibly, this motivation may prove to be both an economically and biologically sustainable solution for making wildlife pay for itself (Child & Child 1990, Eltringham 1994). However, this "use-it-or-lose-it" philosophy (Baskin 1994, Kock 1995) is not without its critics (for a review see: Lavigne, Callaghan & Smith 1996). Central to the arguments against hunting is the notion that profit-oriented short-term gains go largely to an elite few at the expense of the masses and increase the risk for over-exploitation. Therefore, given that some target species are especially vulnerable to over-exploitation, in large part due to their life histories (e.g. lions), relative demand by trophy hunters, and economic potential, it is critical that they be managed conservatively and responsibly in order to assure their future existence.

As one of the principal attractions for safari hunters, lions are economically important to the hunting industry. However, a high risk of infanticide associated with the removal of resident males, combined with high demand, unsustainable quotas, and an industry plagued by mismanagement, make lions particularly vulnerable to over-exploitation (Whitman 2002, Yamazaki 1996, Loveridge *et al.* 2007, Packer *et al.* 2009, 2011). For these reasons, lions have a high "extinction potential". This easily sets up a situation of "killing the goose that lays the golden egg" when profit-oriented short-term gains become the driving force behind lion management, rather than sustainable quotas and long-term conservation. Likewise, because harvesting a socially complex species, such as lions, may result in unforeseen cumulative effects, traditional models used for the harvesting of ungulates may be misleading to even the well-intentioned manager, if not at odds with sustainable use (Whitman & Packer 1997, Greene *et al.* 1998).

Currently, only a few scientific studies have examined the extent to which sport hunting affects lion populations (Zambia: Yamazaki, 1996; Tanzania: Creel & Creel 1997, Whitman & Packer 1997, Whitman *et al.* 2004; Zimbabwe: Loveridge *et al.* 2007), and the long-term management implications from an economic or biological perspective have yet to be fully

understood (Whitman 2002). In order to effectively hunt lions within an area, without causing negative impacts on the population, it is imperative to study populations to determine the status of the individuals within the local prides (Whitman & Packer 1997).

Lions tend to be relatively resilient in recovering from population declines, and even catastrophic events, when conditions are good. For example, in the Serengeti National Park, after experiencing a particularly virulent form of canine distemper in 1994-95 that killed approximately 30% of the population, the lion population was fully recovered within a few years (Packer *et al.* 1999). Similar recoveries were recorded in the Kruger National Park after intensive culling programs (Smuts 1976, 1978). However, despite a lion population's ability to recover quickly, local population reductions and extirpations are not uncommon and may result from a combination of a number of factors: illicit game meat hunting, civil unrest, human encroachment, problem animal control, habitat loss, and unsustainable trophy quotas, to name a few. By targeting specific individuals based on their social status, safari hunting could however become a useful management tool to facilitate and maintain population growth and management.

Furthermore lions are also known to affect populations of prey (Mills & Shenk 1992) and smaller carnivore competitors, such as the African wild dog (Mills & Gorman 1997) and cheetah (Kelly & Durant 2000), adding to the uncertain future of several endangered species. Additionally nomads, dispersing subadults and resident lions often become problem animals creating conflicts with farmers and local people.

Large carnivores frequently symbolise Africa's wilderness to the general public who support their relocation or reintroduction. The lion holds a deep emotional appeal to the general public and is the single most sought-after species for tourists visiting reserves. Revenue from increased eco-tourism to South Africa is viewed as a potentially lucrative alternative to either hunting or subsistence and intensive farming practices, which are usually at odds with wildlife. As a result, government and private landowners in South Africa are attempting wildlife reintroduction projects on a scale that is not occurring anywhere else in Africa (Hunter 1999, Funston 2008).

2. Motivation for Trophy Hunting Lions in the Savé Valley Conservancy

To date the main aim of hunting lions in the Savé Valley Conservancy has been to raise revenue. From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year^{-1}), yielding gross income of US$912,900 (US$182,580 year^{-1}). Currently the conservancy has a lion population of similar density (160 lions = 6.9 lions/100 km^2) to similarly vegetated areas in northern Kruger National Park with medium prey density (Ferreira & Funston 2010). However, projections based on prey biomass suggest further increase can be expected. Being surrounded by communal settlement areas the conservancy is a net source for lions in

the area, and is no longer a sink for dispersing lions from other areas. Therefore, the population needs to be managed as a distinct population, largely isolated from other populations, but still with the possibility of genetic material coming in from other areas. As a source area, with dispersal of animals to surrounding areas, trophy hunting may be an appropriate management tool to reduce conflict with adjoining land users by targeting specific males before dispersal and possibly small prides in high conflict areas (Venter & Hopkins 1988). In fenced reserves in South Africa intensive removals of dispersing lions are routinely done to reduce the risk of lions breaking out into communal areas (Van Dyk 1997) and to control population growth (Kettles & Slotow 2009).

3. The Potential of Safari Hunting to Impact Lion Populations

Literary sources indicate that excessive safari hunting of lions has the potential to negatively affect lion populations (Yamazaki 1996, Whitman 2002, Loveridge *et al.* 2007, Groom & Funston in prep), especially when lion quotas are large in relation to population size and animals taken from the population are in the early part of their reproductive prime. It is, however, very important that this impact is measured appropriately, and that the results of various data analyses are carefully interpreted. For example, professional hunters throughout Africa generally suggest that "suitable" trophy males appear to be declining in many areas over the last few decades, which may in many cases be true (Yamazaki 1996, Loveridge *et al.* 2007), and may serve as an index of a negative trend within the population. However, it would also seem that immature males are often easier to find because they readily scavenge from baits and are often less wary than older males, thus making them more vulnerable to hunters (Whitman 2002). This could thus in part account for the higher proportion of substandard trophies exported from Africa each year.

The sex and age of the lions hunted is thus important when assessing sustainability. The importance of adult survival for population growth has been reported for numerous moderate- to long-lived (k-selected) animal species (Wu & Botkin 1980, Crouse *et al.* 1987, Caswell 1989, Crooks *et al.* 1997). Since adult survival acts upon individuals with the highest reproductive value repeatedly, changes in this demographic rate are likely to strongly affect population growth. Van Vuuren, Herrmann and Funston (2005) using a deterministic spreadsheet model, found that adult female survival is the most important factor influencing population growth, and that human-livestock-conflict accounted for significant numbers of adult lionesses being shot each year in areas adjacent to the Kgalagadi Transfrontier Park. Loveridge *et al.* (2007) showed that persistence of boundary prides in Hwange National Park is negatively affected both by excessive adult mortality through hunting, as well as adult female mortality through sport hunting and human-livestock-conflict. It would thus seem that the frequency of adult lioness mortality a particular lion population is exposed too might be decisive in forecasting its long-term viability. Until recently lionesses were not hunted in the conservancy and as such this strongly increase the

viability of this population, and its resilience to limited sport hunting of adult males. However, a limited off take of adult lionesses (<3%) should be sustainable (Van Vuuren *et al.* 2005).

Although adult females are crucial members of the population, consideration should also be given to the effect that mortality of pride males might have on the survival of age-classes that are vulnerable to intra-specific competition or conflict, namely dependent cubs that are susceptible to infanticide. The most important shortcoming of most models thus far is that they are unable to monitor or detect socio-ecological changes in the population (Van Vuuren *et al.* 2005), which may be of particular importance if lion persecution were to cause changes in social behaviour (Yamazaki 1996, Whitman & Packer 1997). This has largely been overcome in a model published by Whitman *et al.* (2004), which shows that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and quality in the long-term. Whitman *et al.* (2004) conclude that any males ≥ 6 years of age can be safely hunted without negative effects on the population. This figure, however, is being widely debated as being too young, and may represent the market forces in the country (Tanzania) where the research was conducted.

The mechanism by which the loss of mature males is thought to influence the population is that it may result in an increased rate of young cubs succumbing due to the pride being irregularly guarded by the fathers (Loveridge *et al.* 2007) or infanticide when new adult males become the pride owners (Schaller 1972, Packer *et al.* 1988), ultimately having a detrimental effect on the growth of the population (Starfield *et al.* 1981, Whitman & Packer 1997). Thus the role of the territorial males in defending their territories against other challenging males, and the protection they afford their offspring, should not be dismissed. While it is possible as suggested by Whitman *et al.* (2004) that younger males can impregnate lioness, the experience and maturity of adult males may be very important for successful rearing of cubs.

In areas depopulated of mature males the remaining mature males cover very large areas incorporating several prides (Yamazaki 1996, Loveridge *et al.* 2007). This obviously reduces their ability to effectively defend their prides ranges, and results in average pride size, as measured by the number of lionesses, declining to ≤ 3, as well as cub survival declining to low levels (Loveridge *et al.* 2007). Packer *et al.* (1988) showed that prides of 3-10 adult lionesses have a higher individual fitness than smaller or larger prides, and thus prides reduced to <3 adult females have lower probability of persisting.

Adult males in the Selous Game Reserve, Tanzania, were shown to be able to sustain sport hunting that removed between 2.7 and 4.3 percent of the population annually (Creel & Creel 1997), while the removal of 10 to 16 percent is suggested to be unsustainable in the

long-term (Starfield *et al.* 1981, Venter & Hopkins 1988) in a closed population. In Zimbabwe a quota of 8% of the male population (Martin & Thomas 1991) has been shown to be difficult to sustain (Loveridge *et al.* 2007), although it is debatable whether the starting populations were accurately estimated. Thus it appears that adult males are more resilient to trophy hunting than are adult females, and that off takes of about 5-10 % per year of the adult males in the population are probably sustainable provided that the individual lions are selected carefully (Starfield *et al.* 1981, Venter & Hopkins 1988, Whitman *et al.* 2004).

The challenge that management is thus confronted with is to reliably estimate population size and structure and set a sustainable off take. This is, however, more complex in a reserve such as the SVC, which also supports a sizeable ecotourism sector incorporating safari lodges and photo-tourism vehicle safaris, for which reliable and satisfactory sightings of species such as lions are paramount.

4. Lion Survey Techniques to Determine Quotas

Conventional census techniques are inappropriate for estimating numbers of nocturnal, low-density carnivore species such as lions. The difficulties include that due to their cryptic shy nature, and because many lion areas are wooded further reducing visibility (Norton-Griffiths 1978), which makes aerial censusing inappropriate for lions. Furthermore in areas where lions are intensively hunted they are more likely to be shy, affecting most censusing techniques (Whitman 2002, Funston & Janse van Rensburg 2003). The best method to obtain a reliable population count and demographic assessment of a lion population is via a direct count, whereby each individual in the population is identified and counted. Packer *et al.* (1999) clearly demonstrates the benefits of using individual identification in terms of tracking population fluctuations in the Serengeti over 30 years. However, direct counts are generally not only prohibitively expensive and time consuming, but are also potentially impractical for anything but small areas.

Once direct counts have been discounted for surveying the size of a specific lion population can be effectively determined through total counts using a baited call-up station methodology, as developed by Smuts *et al.* (1977). Mills, Juritz & Zucchini (2001) developed a calling station method (limited time without bait) for censusing spotted hyaena (*Crocuta crocuta*), which has been adapted for censusing lions (Ogutu & Dublin 1998, Ferreira & Funston 2010). Call-ups surveys are generally conducted by broadcasting hyena vocalizations at a kill and/or wildebeest or buffalo distress calls across loudspeakers, and are useful at estimating lion numbers (Mills, 1985; Creel & Creel, 1997; Ogutu & Dublin, 1998, Ferreira & Funston 2010). Calling stations rely on a single, independent experiment to estimate the probability of the response to sounds, which might be different for different regions (Loveridge *et al.* 2001). Thus, call-ups have not yet been clearly shown to be effective for censusing lion populations in all situations, and may be biased by lion response

probabilities being variable as well as by poor experimental design or incorrect analysis. Response to call-ups seems to be particularly low in low-density (Funston 2001) and trophy hunted lion populations (Whitman 2002, Funston & Janse van Rensburg 2003). Furthermore, the effective luring range for predators varies considerably with regards to the vegetation density, topography as well as the season. Smuts *et al.* (1977) suggested that the dry season is definitely the best time of the year to carry out surveys.

There have been recent advances in using track frequency as an index to estimate lion density (Stander 1998, Funston & Ferreira 2010). The Savé Valley Conservancy is a good site for this monitoring technique as it largely has suitable road substrate, available tracking skills, and the possibility of accurate direct counts. As will be presented below it is likely that the combined knowledge of safari guides and landowners could be effectively collated to determine annual estimates of the lion population size and structure within the conservancy.

Given the difficulties generally encountered when trying to estimate lion abundance in a particular area, it is not surprising to find that lion quotas for hunting concessions in Africa are in most cases based on little more than educated guesses (Severre 1995). Thus, as most hunting areas do not have a reliable count of lions, recommending a number based upon a certain percentage for sustainable harvest is inherently problematic in most areas. Lion hunting is thus generally adaptively managed in the sense that off take is generally a reflection of what hunters were able to find in the previous year. In contrast, with good monitoring it should be possible to set lion hunting quotas in the conservancy more carefully based on good estimates of population size and structure. Adaptive management is an accepted technique in resource management (Holling 1978, Walters 1986), and should be the guiding principle in the conservancy to set annual quotas.

However, in practice sound guidelines and adaptive approaches are often flawed in a few important ways specific to the lion hunting industry. This is because standards in trophy quality are often not maintained, quotas are often set beyond sustainable limits, and lions are often then lured out of national parks into adjacent hunting areas. The problems encountered in the lion hunting industry are primarily because much profit is to be made by shooting lions, and government issued policies and quotas are not always conducive to long-term management, nor are government employees beyond corruption whether it be at the lowest or highest level (Overton, 1998). Thus, unless the professional hunter adheres to a higher standard in selecting trophies and companies follow suit by insisting upon (if not suggesting) sustainable quotas, the profit-based quota system as it stands now is not sustainable in the long-term for most countries.

It is, however, clear that the Savé Valley Conservancy collectively desires to conduct safari hunting in a responsible and conservative manner and will police unethical behaviour. This is

important both in terms of sustainability, and to ensure minimum disruption of the photo-tourism potential within the reserve.

5. Population Dynamics and Regulating Lion Population Growth

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land and due to the protection afforded are increasing in numbers (Funston 2008). Although increases are typically a desired management outcome inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives and thus population control measures need to be instituted (Kettles and Slotow 2009; Slotow & Hunter 2009). Population control of lions does, however, often create a management dilemma as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference, the measures typically employed to control lion populations include translocation of subadults to new reserves, contraception of breeding lionesses, culling (including trophy hunting) and social manipulation (Kettles & Slotow 2009).

All of these management options require a degree of population monitoring, which is often more costly than the management intervention. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals. Thus although a useful approach, translocation is not likely to remove sufficient lions to be considered as the key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation. Lions are just too shy in the conservancy and not well enough understood to effectively apply contraception. However, this could change with time if more resources are invested in monitoring, and particularly if trophy hunting pressures where eased in areas of the conservancy wanting to focus on photo tourism.

As the numbers of lions in many southern African reserves have reached saturation, generally most reserves are currently faced with the need to cull lions (Kettles & Slotow 2009). Typically this is achieved through the shooting of excess independent subadults, adult male coalitions, and occasionally lionesses from prides. The latter option is problematic mainly in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough to allow natural population regulation mechanisms to be applied or simulated. However, population control methods that largely simulate natural processes are likely to produce the most desirable outcome, with the

minimum intervention, and thus minimum social disruption. The Savé Valley Conservancy is, however, large enough to allow simulated approaches.

Social disruption *per se* is a fourth population management approach the can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves. Thus although all feasible approaches to lion population control should be investigated, currently culling as a trophy hunting exercise is the most suitable option for the conservancy. Thus the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach.

To date the aim for trophy hunting lions in the conservancy to date has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth. The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth.

The various estimates suggest that currently there are about 170 lions in the conservancy (Appendix 1). An older male biased trophy hunting system, with limited hunting of adult lionesses in certain contexts should stabilize population growth. To be successfully implemented, however, trophy age needs to be carefully monitored, and accurate hunting records kept. The aging criteria and required hunt records are outlined in Appendix 2. As it is the stated goal of conservancy members to hunt lions for profit, and as the threshold lion population that will not induce financial cost is relatively low (Appendix 3), various trophy hunting options to regulate lion population growth are proposed here. The strategies that are suggested are outlined below and discussed in detail in the following four sections:

5.1 Hunting male lions at an age threshold that will stabilize population growth

Whitman *et al.* (2004) showed that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and the quality of the long-term kill. Whitman *et al.* (2004) conclude that any males $\geq$ 6 years of age can be safely hunted without negative effects on the population. Thus logically if one wanted to reduce a lion population one might hunt males below this age threshold, whereas stability should be

achieved hunting at the age-threshold (see Figure 3). This is proposed as the key lion management tool to be employed in the conservancy.

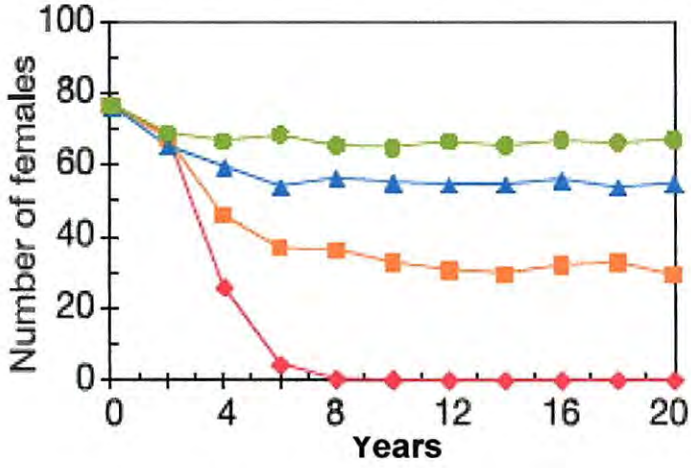

Figure 3. The effects of trophy hunting on the number of adult females after 20 years, as a function of quota size and male age. Average outcome after 100 runs is shown from shooting males of the following ages: ≥3 yr old (red), ≥4 yr (orange), ≥5 yr (blue), ≥6 yr (green)(from Whitman *et al.* 2004).

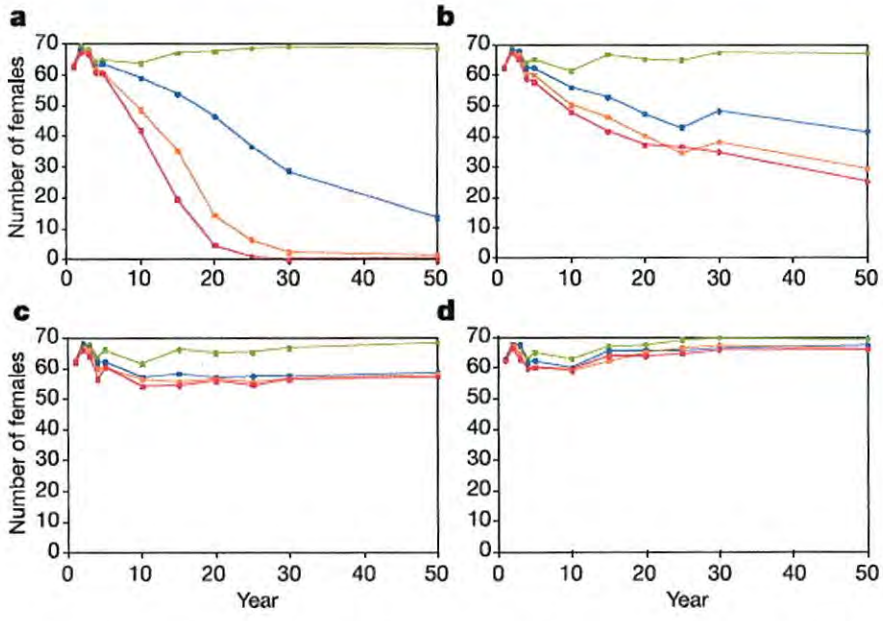

Figure 4. The effect of quota size and male age on female population size through time as a function the age at which males are hunted. Red indicates average outcome over 100 runs from annual quota of 10 males, orange from quota of 6 males, blue from quota of 4, and green from quota of 2. a–d, Female population size when hunters shoot males that are ≥3 yr old (red), ≥4 yr (orange), ≥5 yr (blue), ≥6 yr (green)(from Whitman et al. 2004).

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key demographic patterns. An example of how harvesting a fixed number of males in different age categories is depicted in Figure 4.

5.2 Hunting males out of male coalitions that are large or are defending key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age (Packer *et al.* 1988). But males $\geq$ 7-8 years of age are the most suitable age class for sustained trophy hunting. However, in certain circumstances very large coalitions acquire territories at 4-5years of age (Bygott *et al.* 1979). These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

Mosser and Packer (2009) found that territorial competition directly affected critical components of female fitness, and that larger prides gained and maintained access to the highest-quality habitat. Neighbours had a significant negative effect on female reproductive success and survival, and larger prides were significantly more likely to maintain control of disputed areas and to improve the quality of their territories. Thus in order to reduce the high reproductive potential of large prides occupying key territories males from these prides should be especially targeted for hunting. These dominant prides typically occupy territories including multiple river intersections and large resident herds of buffalo (Mosser & Packer 2009).

5.3 Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates to possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems (Stander 1998). For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management. See section on problem animal control for more details.

5.4 Hunting older females from key prides to stabilize population growth

Although it has been reported generally that hunting lionesses can lead to population declines (Whitman *et al.* 2004, Van Vuuren *et al.* 2004), there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights (Mosser & Packer 2009). But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours and if females are to be hunted select females from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo-tourism objectives.

6. Offtake Strategies and Final Recommendations

It is recommended that the off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via track frequency, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported on an annual report.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

7. Response to stock raiding lions (and other predators)

In the Savé Valley Conservancy area there are four main constituencies involved in issues to do with problems of livestock depredation by lions (and large predators). These include:

1. Land owners/managers of private ranches in the conservancy
2. Settled communities within the conservancy
3. Neighbouring communities outside the conservancy, and
4. Zimbabwe National Parks and Wildlife Authority

When incidences of live-stock depredation occur these constituencies have different roles to play in addressing the problem. Ideally these roles, and the procedures to be followed, should be decided as part of a consultative workshop process, which is recommended as a next step. The recommendations presented here are synthesised from other published sources (Funston 2001). The keys to minimising conflict include primarily mitigating or preventing livestock depredation from occurring in the first place, and good communication and effective resolution of problems when they do arise.

7.1 Mitigating (preventing) livestock depredation

Much has been written in the literature about conflict between man, predators and livestock and this remains a highly contentious issue. Clearly findings to date indicate that the best way to minimise the development of conflict situations is through the appropriate livestock husbandry or management practices. Essentially the parties should attempt to minimise the contact between predators and livestock, and have measures in place to warn of the presence of predators in the vicinity of livestock. Once the predators have been detected they can often be chased off without incidence. Accompanying this management plan is a Human-Lion Conflict Toolkit document with all the practical steps that should be implemented to minimise conflict (see page 3 of the toolkit). This toolkit should be made available to all landowners, and representatives of all villages of both settled and neighbouring communities.

Where possible it would be in the long-term interests of landowners within the conservancy to engage, particularly with settled communities, to help them implement the recommendations of the Human-Lion Conflict Toolkit. In summary conflict can largely be mitigated by the following fairly simple husbandry techniques:

a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators)
b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

7.2 Response to livestock depredation events

7.2.1 Settled and Neighbouring communities

a. Promptly report livestock depredation events to the landowner with title deed for that area, the conservator, and ideally the Zimbabwe National Parks and Wildlife Authority. Report accurately the characteristics of the offending large predators or incident so that all have a better idea of what to expect when planning how to respond. This should include descriptions of a) location b) time of day c) was the livestock animal in a kraal at the time d) what are the specifications of that kraal e) has this happened before recently in this area.
b. Settled communities should invest in the necessary communication technology to effectively and timeously report any incidents.

7.2.2 Landowners with title deeds and conservator

a. Respond promptly to reports of offending large predators and livestock predation incidences.
b. Visit the site where the incident occurred and assess the severity of the situation. Just having someone come and investigate can largely reduce tensions.
c. Consult with livestock owners about their livestock management and if possible offer assistance or advice on how to improve their animal husbandry to minimise conflict. The Human-Lion Conflict Toolkit (see Appendix 2) should be consulted to facilitate solving the problem and advising the most appropriate mitigation measures.
d. In the event of repeat problems in that area, and failing of implementing mitigation measures the best option may be to remove or destroy the offending predators. The actions need to be very focused with the specific offending animals targeted. From 2011

to 2015 there will be a lion conservation and management project running in the conservancy and in Gonarezhou National Park. The park has relatively few lions at present.

e. These suggestions are preliminary and need further deliberation through a workshop before being implemented.
f. Different response guidelines for 'occasional' and 'habitual stock raiders' should be followed.

7.2.3 Stock raider classification

a. Occasional stock raiders (first or one incidence reported)

- Attempt the recommended mitigation measures to determine whether this resolves the problem

b. Habitual stock raiders/problem animals (two or more incidences reported)

- Decide whether to translocate or destroy. For example if a lion eats 10 cows over the course of three weeks because those cows are left wandering around the conservancy at night without any protection, that lion is simply an opportunist, not a problem. If however, a lion takes only 3 cows (3 different incidences) out of a well constructed boma, where there are people and dogs sleeping nearby, it is possibly a genuine problem animal. Once there is evidence that livestock was being properly looked after at the time the incident occurred, mitigation measures may be taken.

7.2.4 Record keeping of incidents and co-operation

a. Community, conservancy and park management staff need to improve their record keeping systems to yield more information about offending animals, e.g. sex, age, status, etc., and communicate this in an annual report to all constituencies.
b. Hold an annual farmers meeting to discuss problems and report back on recent incidents.

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Firstly and very importantly I would like to thank the landowners and managers of the Savé Valley Conservancy for the enriching opportunity to work towards and adaptive management plan for lions the conservancy. There are few areas in Africa where lions are increasing in numbers even when being hunted, with this work thus giving me a unique opportunity.

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Appendix 1: Savé Valley Conservancy Lion Population Survey 2011

Introduction

To augment lion monitoring efforts conducted thus far in the conservancy a baited call-up lion survey was conducted from June 20 to July 10, 2011. This short report is thus largely intended for immediate decision making of lion quotas for 2012-2014. The lion survey was largely designed to determine whether the population increases estimated from spoor counts (Groom 2008-2010; Figure 1), and reported by landowners, were supported by an alternative survey technique. Such a survey would also provide information on the population's age and sex structure which spoor counts cannot do. The average growth rate of the SVC lion population from 1999 to 2010, as estimated largely by spoor counts, was calculated at 35% per year. Such high growth rates have been recorded in re-introduced lion populations elsewhere (Funston 2008), but we wanted to verify if such a high population and growth rate was indeed characteristic of the SVC lion population.

Methods

The survey method used was baited call-up stations as described by Smuts, Whyte & Dearlove (1977), with a modification to the method in the use of camera traps to photograph shy or elusive lions. We used a density of 13 call-up stations per 1,000 km^2, to ensure that we sampled an area of 1886 km^2 assuming a response radius of 5 km (Smuts et al. 1977). A total of 25 stations were surveyed (Figure 5). We attempted to space all stations about 10 km apart from each other, but various logistic constraints precluded an ideal distribution of calling sites in some areas. Notably we would like to survey one or two additional sites on Sango. We were also not granted permission to survey the Msaize and Mapari ranches, and thus positioned calling stations close to their boundaries. For Savuli we had comprehensive camera trap records that further surveying was not necessary in that area. As the stations where placed on the conservancy in a series of concentric 5km radii we assumed this design would achieve as close as possible to a total count, realizing though that the response probability of the lions was not known.

Unlike the non-baited call-up station technique of Ferreira & Funston (2010), the baited call-up design of Smuts et al. (1977) was not calibrated to determine response radius and response probability. However, surveys using this technique in Kruger National Park have consistently revealed close to comprehensive total counts. As we conducted the call-ups for five to six hours, instead of the recommended all night (Smuts et al. 1977), we analyzed our data both with a total count tally, as well as with the relationship defined by Ferreira & Funston (2010) for calling stations to get an idea of how both compared with annual spoor counts (Groom 2008-2010), and with land-owner estimates. A few weeks before the survey

the land owners/managers were asked to collate as much information as possible on the status of lions on their farms. This information was collected in the form of maps where the size, composition, and approximate area of activity of each known lion group were noted. Camera traps placed for hunting purposes greatly facilitated this process.

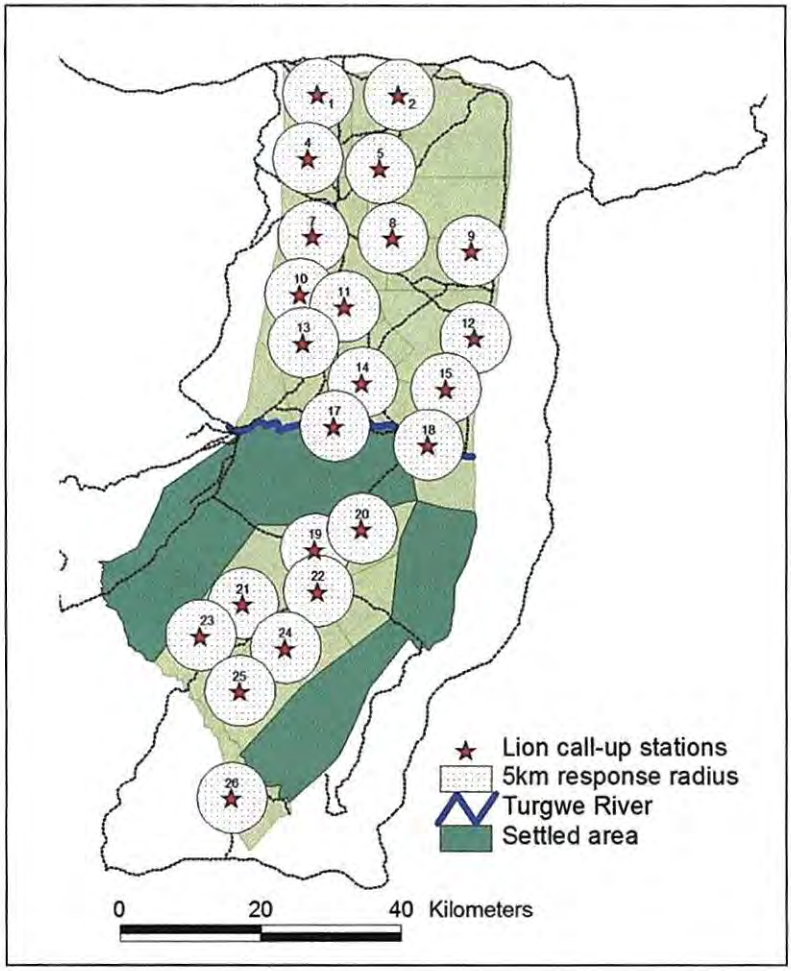

Figure 1. Map of the Savé Valley Conservancy indicating settled area and the planned position of calling stations for the 2011 lion survey

For the survey we used bait in the form of either whole or halved wildebeest and zebra carcasses, and in some cases legs of elephant from culled animals. The gut contents of carcasses were kept and dragged along roads for about 1-3 km in the vicinity of capture stations. Once the drags were completed the carcasses were tied to the base of a stout tree, and branches packed behind the bait to ensure that the lions would feed on the right side of the carcass for identification photographs to be taken, and to permit darting. Camera traps were placed at about 45˚relative to the vehicle bait axis on either side 6-10 m from the carcass. At most stations two cameras were used. Just after sunset the sounds of a buffalo calf in distress, and hyaenas and lions feeding, were broadcast in thirty to sixty minute

intervals with sporadic quiet periods interspersed in between. We used an iPod connected to a 12 volt, 60 watt amplifier, connected to two 4-ohm horn speakers, each with a 40 watt driver unit. The speakers were connected in series and placed c. 2.5m above the ground either on the roof of the vehicle, a steel tripod, or suitable tree, facing 180° direction from each other. The vocalisations were broadcast at full volume, with speakers rotated 180° every 30 minutes to get an all-round sound distribution.

At least two observers sat in the back of the vehicle. When any animal was heard approaching, a torch and/or a red-filtered spotlight were used to identify the animal or group of animals. Parameters recorded included species, number of individuals, group composition (age and sex) and time of arrival at the station. Once all lions in the group had arrived, and were accounted for we darted an adult lioness from each pride encountered, and a sample of males above three years of age, for the fitting of Sirtrack VHF radio-collars.

Results and Discussion

A total of 25 stations were sampled over 14 nights. A total of 44 lions were recorded at the stations (Table 1). During the survey ten lions were immobilized of which eight were large enough to be fitted with radio-collars. These included four male and four female lions (Table 2). An additional five radio-collars are still available to be deployed.

Table 1. The sex and age composition and numbers of lions recorded at calling station during the SVC 2011 lion survey

Station	Time	Number	Group composition
5	20:38	2	2 adult females
7	18:20	4	2 adult males (c. 4-5 years) and 2 adult females (c. 7-8 years)
10	20:05	5	1 adult female, 2 large cubs (c 18 months old), 2 young cubs
11	18:00	2	2 subadult males
13	22:00	1	1 adult female (possibly lactating)
14	23:20	2	1 adult male, 1 adult female
18	18:42	2	2 subadult males (3-4 years)
19	17:55	3	3 large male cubs (c. 18 months)
19	21:50	2	2 subadult males(3-4 years)
19	23:00	4	4 subadult females (2-3 years)
20	18:20	4	2 subadult males, 2 subadult females
21	23:42	1	1 subadult male
22	23:20	5	2 subadult males, 3 females
23	20:30	2	2 adult females
23	22:40	2	2 subadult males
26	18:05	3	2 adult females, 1 adult male
	Total	**44**	

Table 2. Details of lions collared during the SVC 2011 lion survey

Station	Ranch	Collared animal	Collar Frequency
7	Sango/Chishakwe Boundary (Vuma hills)	Adult female (c. 7-8 years)	149.3990
		Adult male (c. 4-5 years)	149.0700
11	Sango - Central	Subadult male (c. 3-4 years)	149.2210
19	Humani - near Mbizi dip	Subadult male (c. 3-4 years)	149.0600
20	Humani - Zambara area	Subadult female (c. 3-4 years)	149.3200
23	Hammond - Near Mopane Pan	Adult female (c. 4-5 years)	149.4200
		Subadult male (c. 3-4 years)	149.2390
26	Impala - central	Adult female (c. 3-4 years)	149.4400

The current lion population estimate for SVC (Table 3) is synthesised from several approaches including an estimate based on the 2010 spoor estimate compounded by the average growth rate from 2007 to 2010 (Groom 2008-2010) to give a 2011 estimate, an estimate of the lion population based on extrapolation of the call up survey, the application of the calling station equation (Ferreira & Funston 2010), and the sum of the managers estimates. A synthesised view from all of these is that there are probably about 160-170 lions in the non-settled areas of the SVC at present. The available data does not allow any better estimate but it is encouraging that the spoor, calling station and managers estimates are all very much in line with each other.

Table 3. Estimates of the lion abundance in the SVC as determined by the 2011 lion survey

Survey method used	SVC lion population estimate
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

The sex and age composition of the 44 lions recorded during the survey are presented in Table 4. During the survey adults comprised 41% (n = 18) of the lions observed, subadults 43 % (n = 19), and cubs 16% (n = 7). These are similar ratios of adults to other studies, but the subadult segment of the population comprised a higher percentage than is typically found. Thus fewer cubs were recorded than is typical. Either lionesses were not willing to bring their young cubs to calling stations or at present the SVC lion population is dominated by young adults and a high proportion of subadults. The latter explanation seems most likely as the lion population only really started increasing dramatically in 2007. Thus it would be expected that as this 'young' lion population matures a subsequent pulse of reproduction is

expected. This is largely supported by the manager's estimates which recorded a slightly higher cub percentage, but nevertheless lower than typical lion populations.

Table 4. The sex and age ratios of lions in the Savé Valley Conservancy from to 2011 lion survey and managers estimates

Sex / Age classes		Total count		Managers estimate	
Adults	Adult females (>4 years)	14		62	
	Mature adult males (>6 years)	0	***41%***	2	***50%***
	Young adult males (4-6 years)	4		17	
Subadults	Subadult females (2-4 years)	6		3	
	Subadult males (2-4 years)	13	***43%***	19	***28%***
	Subadults unknown	0		8	
Cubs	Cubs	7	***16%***	36	***22%***
	Total	**44**		**162**	

Both estimates (total count and managers estimates) sex and age proportions indicate that the SVC lion population has a relatively high number (and proportion) of adult females, very few mature (>6 year) and young adult (4-6 years) males, and a high proportion of subadult (3-4 years) males, with relatively few cubs. Adult lionesses also outnumber adult males by a ratio of 1:3.3 to 1:3.5. This is a relatively high ratio typical of hunted populations where adult males are removed by hunting.

Recommendations

It is clear that a high number (and proportion) of the SVC lion population are sub-adult males suggesting that many of them will mature into the adult age class in the next few years. However, the relatively distorted adult sex ratio indicates that trophy hunting is removing almost all the mature (>6 years) males in the population. During the survey the oldest male lion we observed was only 4-5 years of age and none were suitable trophies. From the managers estimates we only got reports of two mature adult males, with 17 young adult (4-6 years) males being reported. This is further evidence of the fact that trophy hunting in SVC is effectively removing the mature adult male age class from the population.

The lack of mature males does not seem to be problematic in terms of reproduction, as there are relatively high numbers of cubs, and particularly subadults, in the population. The lack of mature males may, however, be problematic for SVC in terms of hunter satisfaction as clients are unlikely to be consistently satisfied with only hunting young males that do not have heavy manes.

As the landowners generally seem to feel that there are either enough, or in many cases too many lions, the method to halt population growth will of necessity have to include the shooting of either adult or subadult lionesses. This is unfortunately unavoidable when the objective is to halt population growth and a population is not at carrying capacity. This is generally accepted practice when the stated objectives of a wildlife production system dictate that a large carnivore population is too abundant (Packer et al. 2009). Managed hunting of lions will also need to consider illegal killing of problem animals especially by poisoning, but also by shooting.

Thus when setting annual quotas SVC managers need to balance economic returns from good quality trophies, remove the appropriate number of lionesses, and factor in illegal killing, to result in population stability and halt population growth. It may thus be wise to market three types of lion hunts in SVC, which could include a limited number of high quality older male trophies, a larger segment of young relatively poorer quality trophies, and a similar number of lioness trophies. The lionesses should ideally be as young as is acceptable for a trophy, and of an animal not associating in recognised prides. Young lionesses breed at higher rates than older lionesses, with mature pride-living lionesses perhaps being better utilised for photo-tourism opportunities. An additional advantage of shooting young lions is that this age class are the ones most likely to kill livestock.

Ultimately the decision on what and how to hunt lions in SVC lies with the landowners, and needs to be integrated into the overall conservation and management objectives of the conservancy.

Appendix 2: Assessment of trophy hunted lion and leopard trophies

Guidelines for data collection

Sport hunting can provide considerable benefits to conservation if managed sustainably. However, this requires careful regulation and a high degree of compliance with "best practice" standards. This is particularly important for large carnivore species such as lion and leopard that are sensitive to human disturbance and have recently suffered widespread declines. There is a need to standardize data collected from lion and leopard trophies across their range to allow independent assessment of trophy age, trophy quality, and hunt effort. Such data can enable wildlife agencies to track population trends of hunted species over time and react to changes accordingly. The sex and age of harvested individuals will also influence the biological impacts of hunting, and must therefore be monitored closely. In addition, blood and skin samples can easily be taken from trophies to provide valuable information on disease and genetics in wild lion and leopard populations. These data would add immeasurably to conservation efforts.

Effective monitoring requires collaboration between professional hunters (PHs), operators, conservation authorities, and researchers. In this document we provide guidelines on the information and measurements that should routinely be taken from every trophy animal and each hunt. Some of the information is collected in the field by the professional hunter immediately after the hunt, while other data are collected at a later date by examining the cleaned skull. It requires no technical ability or special equipment other than a GPS, digital camera, and measuring tape; all of which are commonly used by sport hunters.

Section A: Information to be provided by professional hunters/operators

1. Hunt return forms

Measures of hunting effort can be used as an index to gauge population trends. This information is best collected on a printed hunt return form filled in by the PH after *every* lion and leopard hunt (i.e. for successful and unsuccessful hunts). Questions should not exceed one page (an example of a hunt return form is provided in Appendix I). The submission of hunt return forms must be mandatory; these data are only useful if collected in a rigorous and consistent manner. Operators must be penalised for failure to submit forms. The onus is on the operator to ensure that all information is sent to the relevant authority by the end of the hunting season. Self addressed envelopes can be provided if postage is necessary.

2. Measurements (included on the hunt return form)

Accurate measurements of body and skull size can assist authorities to age lion and leopard trophies. The Division of Scientific Authority from the U.S. Fish and Wildlife Service require measurements of body size to permit importation of leopard trophies into the United States. In addition, PHs and operators routinely measure skull width and height to provide a Safari Club International rating (width + height in inches) to clients. However, the SCI rating on its own is of limited use; the individual metrics in millimeters are needed to estimate age.

The following body measurements should be taken for every lion and leopard trophy before the animal is skinned:

a) Body length (cm, tip of nose to tip of tail; Measurement A–C)
b) Shoulder height (cm, tip of scapula to end of forepaw; Measurement E)
c) Neck circumference - *only for leopard* (cm, immediately behind the ear; Measurement D)

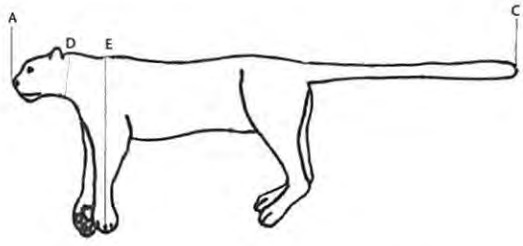

Figure 1: Body measurements to be taken for each trophy before skinning.

Skull measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must provide accurate measurements from the cleaned skull. The following data should be collected:

a) Skull length (mm, greatest length of skull, measured as a straight line between pegs)
b) Skull width (mm, greatest width measured across zygomatic arches)
c) Distance between the post-orbital processes

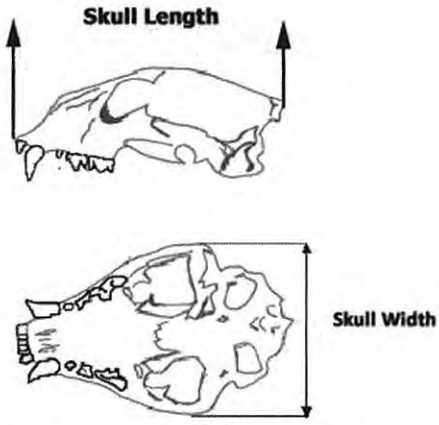

Figure 2: Skull measurements to be taken for each lion and leopard trophy.

3. Photographs

Photographs of the trophy can be used to age hunted lion and leopard effectively. While the traditional photographs taken by clients are useful, more detailed photographs showing body size, facial characteristics, nose pigmentation, tooth wear, and skull dimensions are required for reliable aging. They must be taken from the correct angle and at the highest possible resolution (minimum of 1MB per photo). Nose, teeth, and skull photographs are best taken with the macro-function setting (which is a feature on most cameras) to prevent blurring. The time and date must be correctly set for digital images. Images must also be labeled/tagged with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, and the name of the hunting block or property where the hunt was undertaken. Digital images can either be sent by email or placed on a CD and posted with the hunt return form.

Six photographs are required for each lion and leopard trophy before it is skinned (Plates 1a-f and 2a-f) and a further six photographs from the cleaned skull (Plate 3a-f). The skull photographs and measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must submit all twelve photographs.

Plate 1. Lion (before the trophy is skinned):

Plate 1a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition, and basic mane development.

Plate 1b: Side view of the head and shoulder showing mane development above and behind the ears, and between the shoulder blades.

Plate 1c: Frontal view of the head and chest. Useful for assessing mane development on the chest and between the ears.

Plate 1d: Frontal view of the face showing facial scarring and the nose from directly in front.

Plate 1e: Close up of the nose clearly showing the extent of pigmentation.

Plate 1f: Frontal view of the teeth showing coloration and wear on the canines and incisors.

Plate 2. Leopard (before the trophy is skinned).

Plate 2a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition.

Plate 2b: Side view of the head (lifted) and shoulders. Useful for assessing neck circumference and dewlap development.

Plate 2c: Frontal view of the face showing the position and condition of the ears, and facial scarring.

Plate 2d: Close up of the nose clearly showing the extent of pigmentation.

Plate 2e: Frontal view of the teeth showing coloration and wear on the canines and incisors.

Plate 2f: Posterior view of the hindquarters clearly showing the presence or absence of a scrotum.

Plate 3. Clean skull (same for lion and leopard)

Plate 3a: Lower jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.

Plate 3b: Upper jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.

Plate 3c: Side view of the lower jaw (either side) showing the canine and wear on the cusps of molars and premolars

Plate 3d: Wide shot of all the teeth showing wear, broken teeth, and teeth coloration

Plate 3e: Top view of the skull displaying the distance between the postorbital processes. A measure of scale must be included.

Plate 3f: Side view of the skull showing the relative height of the saggital crest. A measure of scale must be included.

4. Removal of single rooted premolar (P^2) for x-ray assessment

Post mortem x-rays of teeth can assist with aging trophies - the pulp cavity fills in as lion and leopard get older. The best tooth to remove is the first upper premolar (P^2 below); it does not matter from which side of the skull. P^2 is small and will not affect the overall appearance of the trophy. The tooth can be removed from the skull using a pair of pliers although care must be taken not to crack it. The tooth can be placed in an envelope and sent with the hunt return form and photographs. It is essential the envelope is correctly labeled with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, the date the trophy was taken, and the name of the hunting block or property where the hunt was undertaken.

Section B: Additional information that should be collected from trophy animals

Trophy hunted lions and leopards provide a valuable opportunity to collect samples for ongoing conservation research projects. These samples may be particularly important from

areas where research is not currently taking place. They can be collected voluntarily by interested PHs and provided to researchers for analysis. The onus is on the researcher to provide collection materials, details of how the samples must be collected, and to collect the samples at the end of the season. Accurate labeling of each sample is essential with a GPS location (in decimal degrees), the name of the collector, the species, and the date as a minimum.

1. Skin, hair, and scat samples for genetic analysis:

Genetic samples collected from lion and leopard trophies can be used to assess sub-speciation, estimate population size and dispersal distance, examine connectivity between populations, and investigate inbreeding dynamics. This information is critical for establishing range-wide conservation strategies for large carnivores.

DNA can be collected from the trophy by cutting a very small (3-4 mm) disc of skin (that includes both tissue and hair) from anywhere on the carcass. This can be stored in a small cryotube containing either 95% ethanol or salt. If a sterile container is not available, several hairs can be plucked from the trophy (ensuring that the hair root is attached) and placed in a paper envelope.

Genetic material can also be sourced from lion and leopard scat collected by hunters (scat is often found near baits). The best way to handle the samples is to air dry them thoroughly and then to store them individually in sealed plastic bags.

2. Blood samples for disease analysis:

Certain feline diseases such FIV and canine distemper can be tested from blood samples taken by placing a Whatman blotting (filter) paper on the bullet wound until it has soaked through. The paper is then air-dried for 5-10 minutes and stored in an envelope in a cool place. No special techniques or materials are needed other than the Whatman paper, which will be provided by the researcher.

3. Trail camera photographs:

Many hunters now place trail cameras at baits to assess trophy quality prior to setting a blind. Photographs taken by trail cameras can be used by researchers to identify individuals in an area, estimate the relative abundance and vulnerability of different age cohorts in a population, and assess hunter selectivity. PHs must ensure that the date and time information is set correctly on cameras. They should also record the number of cameras that are deployed each day, the number of days that each camera is deployed, and the location (GPS position in decimal degrees) where cameras are deployed.

HUNT PERMIT NUMBER		CLIENT NAME	
PROFESSIONAL HUNTER		HUNTING OUTFITTER	
HUNTING BLOCK		CONCESSION HOLDER	
HUNT START DATE		HUNT FINISH DATE	

1. Was the hunt successful? YES | NO
If no, why not? _____

2. Number of lion / leopard seen during hunt (please provide photographs if possible):

Free ranging: _____ On baits: _____

3. Number of baits used (specify number and species e.g. 5 impala, 1 zebra): _____

4. Number of bait sites: _____ 5. Number of sites fed on by lion / leopard: _____

6. Sex and age of lion / leopard on baits (male, female, subadult, cubs) and how determined (tracks, camera-trapped, seen):

IF TROPHY WAS TAKEN:

7. Date trophy taken: _____ 8. Time shot: _____

9. Location GPS (in decimal degrees): _____

10. Condition of animal (e.g. thin, fat, parasites, scars, wounds, sick, radio-collared, snare wounds, etc.): _____

MEASUREMENTS:

11. Skull length (mm): _____ 12. Skull width (mm): _____

13. Body length (cm): _____ 14. Shoulder height (cm): _____

15. Neck circumference (mm): _____

PHOTOGRAPHS (before skinning):

- Side view of entire body ☐
- Side view of head and shoulders ☐
- Front view of head and chest (*for lion*) ☐
- Front view of face ☐
- Close up of nose ☐
- Hindquarters showing scrotum (*for leopard*) ☐

PHOTOGRAPHS (clean skull)

- Posterior view of lower jaw ☐
- Posterior view of upper jaw ☐
- Side view of lower jaw ☐
- Wide shot of all teeth ☐

SAMPLES

- 2 × premolar for x-ray analysis ☐
- DNA (4-mm tissue plug including hair) ☐
- Saturated blood collection paper ☐

Return form to:
Name:
Organisation:
Address:

Fax Number:
Email :

Appendix 3: Balancing financial and conservation imperatives: trade-offs to maintain viable large carnivore populations and profitable trophy hunting

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Summary

1. Large African carnivores are financially valuable for ecotourism and trophy hunting operations on private, communal and multiple-use state land utilised for wildlife production. However, above certain densities, such species may impose economic costs through impacts on populations of ungulates that are also valuable for trophy hunting. High densities of large carnivores may adversely affect conservation efforts involving smaller carnivore species such as vulnerable cheetahs (*Acinonyx jubatus*) and endangered African wild dogs (*Lycaon pictus*).
2. We investigated the economic and conservation trade-offs associated with managing various species of large carnivores on large, often privately or co-managed communal land (>1000km^2), using a collaboratively managed private wildlife area in south-eastern Zimbabwe, Savé Valley Conservancy (3440km^2) as a case study.
3. Lions (*Panthera leo*) impose substantial economic costs through predation on ungulates, specifically, but for leopards (*Panthera pardus*), trophy hunting benefits significantly outweigh their predation costs. Poaching further disturbed ecological processes.
4. We argue that introducing lions to wildlife production systems necessitates that income from lions is increased by either raising the price of lion hunts, or that income derived from photo-tourism is needed to offset the economic impact of lions.
5. Other members of the large carnivore guild do not influence financial and ecological dynamics nearly as strongly as do lions, and species such as endangered cheetahs and wild dogs may benefit from managed lower densities of lions in hunting concessions and private ranches.
6. Although lions fulfil many important ecological processes, that we have not quantified, there is a need to balance ecological and economic imperatives on private and co-managed communal land to ensure that wildlife-based land uses continue to compare favourably in financial terms with alternative and less conservation-friendly land uses, such as livestock production.

Key words, lions, leopards, predation, trophy hunting, financial implications, management, balancing costs

Introduction

Wild large herbivores provide goods and income to rural communities, have major impacts on land use and habitats of conservation importance and, in some cases, face local or global extinction. As a result, substantial effort is applied to their management across the globe (Gordon, Hester & Festa-Bianchet 2004). In areas where herbivores are commercially utilized, large carnivores can create both economic costs and benefits (Peel & Montagu 1999; Power 2002; Caro *et al.* 2009). In Africa, lions (*Panthera leo*) and leopards (*Panthera pardus*) are unambiguously valuable for ecotourism operations, are high value trophy hunting species, and attract high-paying international tourists (Grobbelaar & Masulani 2003; Booth 2004; Loveridge *et al.* 2007). However, all carnivores impose a cost by consuming herbivores. Thus while sport hunting has provides important economic incentives for conserving wild herbivores, the benefits of wildlife-ranching with large carnivores are less clear (Lindsey *et al.* 2005b).

At natural densities African large carnivores regulate herbivore populations (Fryxell, Greever & Sinclair 1988; Mills & Shenk 1992; Grange *et al.* 2004; Grange & Duncan 2006). Lions especially are the key drivers of this process, being one of the strongest ecological drivers in African savannas (Funston & Mills 2006; Grange & Duncan 2006). Thus, there is a limit to the number of herbivores that can be sustainably removed when lion populations approach equilibrium (Peel & Montagu 1999). These effects are also strongly cyclical, influenced by rainfall variability (Mills, Biggs & Whyte 1995; Funston & Mills 2006; Owen-Smith & Mills 2008a). Predator numbers must be accounted for when calculating harvests of herbivores. Many wildlife populations are additionally impacted by poaching (Lindsey *et al.* 2011).

While most large African carnivores tend to kill smaller, less valuable prey species (Pole *et al.* 2004; Radloff & du Toit 2004; Hayward *et al.* 2006a; Hayward *et al.* 2006b), lions select mainly medium- to large-sized ungulates (Funston *et al.* 1998; Radloff & du Toit 2004; Hayward & Kerley 2005, 2008) that are valuable. If lions and other carnivores reduce the sustainable yield of herbivores, they come into direct competition with hunting operators and local communities that benefit from these resources. This is a world-wide phenomenon where large carnivores occur (Langholz *et al.* 2000). In most countries in Africa, the surface area that is designated either communal or national hunting concessions/game reserves is substantially larger than areas covered by national parks where no hunting is generally allowed (Wilkie & Carpenter 1999; Archabald & Naughton-Treves 2001).

Many of these areas offer the possibility of conserving lions, leopard and spotted hyena (*Crocuta crocuta*), but these species often result in conflict leading to persecution (Ogada *et al.* 2003; Woodroffe & Frank 2005; Kissui 2008; Maclennan *et al.* 2009) or are overhunted (Loveridge *et al.* 2007; Packer *et al.* 2009). However these areas offer ideal habitat for rarer large carnivore species such as cheetahs (*Acinonyx jubatus*) (Durant 2000; Gros 2002; Marker *et al.* 2003) and wild dogs (*Lycaon pictus*) (Woodroffe & Ginsberg 1999; Creel & Creel 2002; Lindsey, du Toit & Mills 2004; Woodroffe *et al.* 2007). Dominant large carnivores, however, can also impact cheetah and wild dog

populations negatively through direct and indirect mechanisms (Caro 1994; Laurenson 1994; Laurenson, Wielebnowski & Caro 1995; Creel & Creel 1996; Durant 2000; Creel, Mills & McNutt 2004). As a model for other areas we examined the Savé Valley Conservancy (SVC), a 3,440 km^2 privately owned ranch in Zimbabwe, where hunting provides the main source of income (Lindsey *et al.* 2011). We used spreadsheet models to evaluate the financial implications of large carnivores in private wildlife areas, and discuss the need for management of lion populations for both economic and ecological sustainability.

Methods and methods

2.1. Study area

Savé Valley Conservancy (3,440km^2), located in a semi-arid area of southeast Zimbabwe, was formed in 1991 by amalgamating 20 cattle ranches, into which 14 species of wildlife reintroduced, and land use shifted to high quality ecotourism and trophy hunting (Lindsey *et al.* 2008). These land use objectives were pursued successfully until a third of the conservancy was annexed in 2001 during Zimbabwe's land 'reform' program (Lindsey *et al.* 2008). Photo-tourism is now almost non-existent and there are high levels of poaching (Lindsey *et al.* 2011).

Large carnivores were all but extirpated by the cattle ranchers (du Toit 1994; Pole 1999). However, in SVC all have increased through natural recolonization, or augmentation, with lion and spotted hyenas populations showing the longest lag effect. Wild dogs, however, increased rapidly following recolonization of the area in 1992 (Pole 1999), due to their high fecundity, the absence of lions, and abundant prey. They peaked at 3.9 wild dogs/100 km^2 in 2004, the highest density on record (Pole 2006; Lindsey *et al.* 2008). Cheetah populations also increased rapidly, but for unexplained reasons declined 2005. Leopard densities seem to have remained relatively high throughout (C.J. Joubert, *pers. comm.*).

2.2. Population estimates

Annual total-count aerial surveys of larger herbivores from 2004 to 2010 (Joubert & Joubert 2010), with adjustment for undercounting (Bothma *et al.* 1990), estimated populations of ten key large carnivore prey species. For large carnivores wild dogs were estimated annually from 1996 through individual monitoring. Lion and spotted hyena populations were estimated sporadically from 1996 to 2007 using call-up surveys (Pole 1999; Pole 2003). From 2007 estimates for large carnivores other than wild dogs were by annual track density index surveys (Funston *et al.* 2010). The generalised model of Funston *et al.* (2010) was used for all species other than leopards where Stander's (1998) model was more appropriate. Cheetah and leopard populations were assumed to be relatively stable from 2005 to 2008. Population estimates for years without surveys were estimated from graph trend lines. Population carrying capacities of large carnivores were determined based on herbivore abundance models (Hayward, O'Brien & Kerley 2007).

2.4. Model development

To assess the impact of all forms of mortality on economics and ungulate trends we built a spreadsheet model with various key inputs.

2.4.1. Prey preferences of large carnivores

To determine the relative proportion of various ungulate species in the diet of large carnivores, where possible we used data from SVC. Scat analyses (Mbizah 2009) provided the basis for determining the prey preferences, but low numbers of lion and cheetah scats necessitated using data from nearby Kruger National Park (Kruger) (Radloff & du Toit 2004). Importantly, eland (*Taurotragus oryx*) and sable antelope (*Hippotragus niger*) did not occur in the area sampled by Radloff & du Toit (2004), and were thus factored into our prey preferences relative to abundance, and accounted for all 'other' species killed by lions, being relatively preferred by lions (Hayward & Kerley 2005).

2.4.2. Predation rates

To estimate annual predation rates we used daily minimum food requirements (Table 1) to calculate the number of adult female equivalents, based on body mass (Skinner & Smithers 1990), of each herbivore that would need to have been killed to meet their needs, in proportion to the prey preference ratios. The available biomass per kill was an estimate of the relative proportion of meat available from small- (<100 kg = 75%), medium- (100-300 kg = 66%) and large-sized (>300 kg = 60%) ungulates. Adults were assumed to make up 50% of each large carnivore population, and sub-adults and cubs were assumed to consume 50% of the adult female requirement (Table 1). However, due to differences in the diets of male and female lions (Funston *et al.* 1998; Radloff & du Toit 2004), we calculated predation rates for each sex.

Table 1. Minimum daily food requirements of the various large carnivore species

	Adults (kg)	Sub-adults and cubs (kg)	Literature source
Female lions	**5**	**2.50**	**(Schaller 1972)**
Male lions	**7.5**		**(Schaller 1972)**
Leopards	**2.5**	**1.25**	**(Bailey 1993)**
Cheetahs	**2.8**	**1.20**	**(Frame 1999)**
Wild dogs	**2.8**	**1.40**	**(Pole 1999)**
Spotted hyenas	**4.0**	**2.00**	**(Henschel & Tilson 1988)**

The total numbers of ten important herbivores killed per large carnivore species per year was estimated by combining the relative proportions of herbivores in the diet, the biomass requirements of each large carnivore, and the numbers each prey species that an individual would kill, multiplied by the annual population estimate of each large carnivore species. We halved this for spotted hyenas as in nearby Kruger spotted hyenas hunted only 50% of their diet, scavenging the rest (Henschel & Skinner 1990).

2.4.3. Determining ungulate population trends

We estimated mortality by summing all quantifiable causes of ungulate mortality. These included trophy hunting, live-capture, poaching and predation estimates. The number of animals found poached from 2005-2009 was adjusted following Lindsey *et al.* (2011). To validate this section of the model we calculated growth rates for time $_t$ to time $_{t+1year}$ that would have been required to reach the population estimates of the following year.

2.4.3. Economic calculations

The financial gains from trophy hunting were calculated as the trophy fee value and the meat value of each animal hunted. However, for buffalo (*Syncerus caffer*) and sable, which were used to sell hunting packages commanding a daily rate in addition to trophy fees, hunt-package fees were also included in the model (calculated as minimum hunt duration x daily rate). The financial losses attributable to predation, poaching and live sales were calculated by summing the value lost in terms of meat, foregone trophy fees, and for buffalo and sable for foregone hunt-package fees. Removals of zebra (*Equus burchelli*) was assumed to result in the additional loss of the value of skins (US$200/individual) (Lindsey *et al.* 2011). All trophy values, daily rates and minimum hunt durations were taken from the main hunting outfitter in the area (Zambezi Hunters 2010).

The value of meat was estimated from the mean adult female body mass of each species (Skinner & Smithers 1990), the mean percentage of body mass comprised of flesh (Bothma, van Rooyen & du Toit 2010), and the mean price that meat was sold for (USD 1.50kg^{-1}). As animals lost to either predation or poaching would not necessarily have been trophy animals, only the average percentage of the overall population of each species hunted from 2005-2009, were considered to be trophies, for which the relevant fee or combined hunt package fee was used to determine that proportion of the losses incurred to large carnivores. To estimate the net economic cost or benefit of various large carnivore species we calculated the annual value of herbivores killed by each carnivore species from the model. We then compared this with the total financial value accrued from hunting those species.

Results

3.1. Population estimates

Buffalo were the only herbivore species that increased in numbers from 2004-2010 (Fig. 2). Populations of giraffe (*Giraffa camelopardalis*), sable antelope, and wildebeest (*Connochaetes taurinus*) remained relatively stable, while eland, kudu (*Tragelaphus strepsiceros*), waterbuck (*Kobus ellipsiprymnus*), zebra, impala (*Aepyceros melampus*) and warthog (*Phacochoerus aethiopicus*) declined. Most large carnivores increased over a ten year period (Fig. 3), with the numbers of lions,

spotted hyenas and cheetahs in SVC being significantly lower than would be expected based on available prey (X^2 = 203, df = 4, P < 0.01) (Table 2).

Table 2. Actual population estimates and predicted population sizes for SVC based on average adjusted herbivore numbers from 2005 to 2009, based on the model of Hayward *et al.* (2007)

	Estimated population in 2009	**Potential carrying capacity**
Lions	148	271
Leopards	249	136
Cheetahs	5	55
Wild dogs	60	63
Spotted hyenas	123	427

3.2. Large carnivore utilization

From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year^{-1}), yielding gross income of US$912,900 (US$182,580 year^{-1}). During the same time 144 leopards were hunted (mean = 28.8 leopards year^{-1}), generating a gross income of US$2,135,232 (US$427,046 year^{-1}). A few cheetahs (n = 5) and spotted hyenas (n = 6) were also hunted, with wild dogs being legally protected.

3.3. Model results

The estimated relative proportion of herbivore prey in the diet of large carnivores was used to estimate the number of prey species killed by each individual large carnivore per year (Table 3). Data showed that lions predated mostly on large herbivores, with male lions preying more heavily on buffalo (Table 3). Herbivore growth rates, determined from aerial surveys, showed that the average required population growth rates generated by the model were similar to those recorded elsewhere (Table 4).

3.3.4. Economic calculations

The model showed that lions, poaching and spotted hyena predation had the greatest proportional financial impact, whereas the costs of leopards, wild dogs and cheetahs were proportionally very much less (Fig. 4). It also showed that at all lion abundances the net cost to predation by lions exceeds the gross income from hunting them, irrespective of the formula used (Fig. 5). It should be noted though that gross income from trophy hunting the selected herbivores, lions and leopards, exceeded the financial losses to poaching and predation by an average of 74%, (Table 5).

Even relatively low earnings per landowner from photo-tourism that could be attributed to the presence of lions (e.g. US$5,000 per year^{-1}), combined with a 5% male lion harvest, resulted in a positive gross financial benefit for up to 70 individuals. These benefits increase as the tourism income ascribed to the presence of lions increases, with 135 lions resulting in no gross costs if each landowner was earning

Table 3. Percentage of herbivores in the diet of the large carnivores used in the development of the model, with the estimated number of each key ungulate species caught per individual predator per year

Prey size / species	Percentage of each prey species (number of prey species caught year^{-1})					
	Male lions	Female lions	Leopards	Cheetahs	Wild dogs	Spotted hyenas
Large (>350 kg)						
Buffalo	45.0 (4.50)	1.2 (1.20)	4.8 (0.00)	0.1 (0.02)	-	2.6 (0.05)
Eland	4.0 (1.00)	4.5 (0.22)	0.0 (0.05)	-	-	1.3 (0.03)
Giraffe	19.3 (1.10)	4.3 (0.12)	-	-	-	-
Medium (100 – 350 kg)						
Kudu	1.4 (0.40)	9.3 (1.23)	7.5 (0.50)	3.7 (0.23)	12.5 (1.16)	19.2 (1.01)
Sable	1.1 (0.20)	2.0 (0.23)	0.1 (0.35)	-	0.1 (0.11)	6.4 (0.20)
Waterbuck	1.4 (0.30)	3.1 (0.36)	1.5 (0.26)	1.2 (0.07)	4.2 (0.34)	2.6 (0.12)
Wildebeest	2.1 (0.50)	10.9 (1.17)	6.0 (0.32)	2.7 (0.14)	1.4 (0.11)	6.4 (0.28)
Zebra	6.4 (0.90)	8.4 (0.58)	-	-	-	-
Small (<100 kg)						
Impala	13.6 (12.10)	40.2 (17.94)	60.3 (14.99)	67.7 (14.50)	73.6 (16.46)	46.2 (8.25)
Warthog	5.7 (3.70)	11.3 (3.65)	7.5 (0.24)	4.2 (0.65)	2.8 (0.63)	-
Other	0.0	1.2	17.2	20.6	5.5	15.3

Table 4. Mean growth rates of the key herbivore populations in the Savé Valley Conservancy from 2005 to 2009, and the growth rates needed to match the next year's aerial estimates after all mortality had been accounted for. These growth rates were compared with mean growth rates of herbivores in Kruger National Park and a variety of South African game ranches and reserves (from Bothma *et al.* 2010)

	In SVC from 2005-2010	Required to achieve the years estimate	Kruger National Park (high predator densities)	Game ranches (low predator densities)
Buffalo	8.9	14.7	16*	12-18
Eland	-6.2	0.2		11-38
Giraffe	-0.2	6.9	5.2	12
Kudu	-17.1	23.4	14.8	13-28
Sable	-2.1	11.0		12-28
Waterbuck	-14.0	9.6	13.4	15-35
Wildebeest	-2.2	5.2	17.4	28-38
Zebra	-11.1	0.8	12.4	21-29
Impala	-8.7	26.8	11.6	23-48
Warthog	-18.4	10.2	12.3	

Table 5. The relative gross financial benefits (in US dollars) of trophy hunting ten key herbivores species, leopards and lions, relative to the costs incurred by poaching and predation

	2005	2006	2007	2008	2009

Hunting income:					
Selected herbivores	1,689,670	2,104,260	2,11,8750	2,470,990	2,423,870
Lions	161,100	161,100	161,100	107,400	322,200
Leopards	400,356	504,152	504,152	370,700	355,872
Total	**2,251,126**	**2,769,512**	**2,784,002**	**2,949,090**	**3,101,942**
Income lost to poaching (%)	132,065 (5.9)	90,506 (3.3)	139,969 (5.0)	171,091 (5.8)	179,279 (5.8)
Income lost to predators (%)	437,670 (19.4)	496,561 (17.9)	457,874 (16.4)	693,357 (23.5)	906,450 (29.2)

US$10,000 year^{-1} from lion related photo tourism (Fig. 5). For leopards, however, there was a gross financial benefit at all abundance levels (Fig. 5).

4. Discussion

4.1 Ungulate populations

Large carnivores influence herbivore populations in profound ways that are often associated with climatic variability. Thus managers need to monitor trends and interpret them in the context of rainfall patterns, predation pressure, and human mortality. In our case study combined pressures of hunting, live sales, poaching, and predation may be negatively influencing the populations of some herbivore species, such as eland, kudu, waterbuck, zebra, impala and warthog. Buffalo, the highest value species, however, showed positive population growth and sable antelope, another high value species, seemed to be stable. There are several explanations for, and implications of, these trends. Firstly, climatically SVC has experienced wetter than average rainfall conditions in the last decade that would be expected by to induce predation driven declines for kudu, waterbuck, zebra, wildebeest and warthog (Mills *et al.* 1995; Funston & Mills 2006; Owen-Smith & Mills 2008b). Zebra are important prey species of lions (Mills & Shenk 1992; Hayward & Kerley 2005) and can be vulnerable to over predation as they have foals throughout the year that are preferred by lions, and show relatively slow development when compared with other ungulates (Grange *et al.* 2004; Grange & Duncan 2006). This cautions against the over utilization of zebra with lions potentially shifting to more valuable herbivore species should the zebra population decline. Eland are highly preferred prey of lions (Hayward & Kerley 2005), and due to their very mobile nature may also be more susceptible to poaching, both of which may be driving population declines. Impala are important prey of all large carnivores (Hayward & Kerley 2008; Owen-Smith & Mills 2008a), which when combined with high hunting, management offtake and poaching may be driving population declines.

4.2. Large carnivore populations

Large carnivore populations were stable or increasing. In terms of their impact on the herbivore-economic dynamic, management mainly needs to decide the best course of action with respect to the dominant influence of lions. Currently lions are at about half of expected ecological equilibrium, at which point lions would have an economic impact that could not be offset by hunting. Moreover

with current herbivore offtakes through hunting, poaching and live sales, such predation levels would be expected to result in herbivore collapse.

In Africa, interactions within the large carnivore guild result in cheetahs (Laurenson 1994; Durant 2000) and wild dogs (Mills & Gorman 1997; Creel & Creel 2002) declining in response to high lion and spotted hyena abundance. Conversely mesopredator release can benefit these species, as well as leopards, when lions and spotted hyenas abundances are low (Crooks & Soulé 1999; Pole 1999; Packer *et al.* 2009). Generally dominant larger carnivores have negative effects on rarer smaller species (Kitchen, Gese & Schauster 1999; Bonesi & Macdonald 2004). These effects have implications for attempts to conserve smaller carnivores both generally and through reintroductions (Lindsey *et al.* 2005a). In SVC, where the wild dog population comprises a significant component (c. 17%) of a small and declining national population, local declines are a concern. Therefore, for lion populations to be temporarily controlled to achieve conservation objectives for endangered species could be considered reasonable practice (Linnell & Strand 2000).

4.3 Economic implications

Several key deductions can be made from the economic model. Firstly, the gross income from trophy hunting of herbivores and carnivores, plus live sales of herbivores, collectively outweighed the losses incurred by predation by a substantial margin. This is likely to be true of any area. However, the net income was not known, and the initial capital investments and running costs of the ranch and hunting safaris, as well as losses to predation and poaching, may well exceed income from hunting. Several landowners reported that with a hunting-only model they were making a net loss, and that if hunting only was applied to remedy this, this would not be sustainable. Seemingly in SVC the only way to make lions more financially viable would be to incorporate photo-tourism, or not have high value species such as sable antelope on the conservancy with lions, or buffalo vulnerable to lions.

We do though make one important caveat in our conclusions. In our case study we were dealing with a recovering lion population substantially below carrying capacity. Lions need to hunt in large groups to successfully hunt buffalo (Scheel & Packer 1991; Funston, Mills & Biggs 2001). We did not have kill data available and it is possible that we overestimated the predation rates on buffalo. Furthermore, lion predation on buffalo varies dramatically with rainfall regimes (Mills *et al.* 1995; Owen-Smith & Mills 2008b) and under current rainfall lions would not be expected to predate heavily on buffalo. However, buffalo remain an important prey species for lions and in terms of the general applicability of the model we believe that without data to the contrary one has to assume that on average buffalo would comprise roughly the proportions in the diet of lions that we used.

Lion predation accounted for the bulk of the loss (47%) to large carnivores, which when the income generated from trophy hunting lions was subtracted, resulted in a net loss of US$115,705 year^{-1} specifically for lions. Leopards, on the other hand resulted in a net benefit of US$ 395,151 year^{-1}. Thus while it is clear that lions impose a substantial cost to a wildlife production system (about 8% loss relative to gross income), the impact of this needs to be evaluated against the objectives of the reserve. The model presented in Fig. 5 indicates a harvesting percentage of five percent of the population. This quota may, however, be too high, and result in social instability in a lion population, with harvest rates of about three percent (Creel & Creel 1997), and the hunting of older males

generally being recommended (Whitman *et al.* 2004; Loveridge *et al.* 2007). Adding a small number of lionesses to the hunting quota did not increase the relative profitability of lions substantially, but may be needed if regulating the population of lions was defined as a management need (Packer *et al.* 2009). In order to protect large carnivore populations from declining, national authorities worldwide generally only allow only the hunting of male large carnivores as trophies (Whitman *et al.* 2004; Packer *et al.* 2009). However, livestock and wildlife producers and local communities may need, under certain circumstances, to shoot adult female large carnivores to either halt or reduce population levels (Packer *et al.* 2009).

Lion trophy fees in Zimbabwe (US$5,983) are substantially lower than the average trophy fees in other African countries (US$14,584) (Booth 2009). However, even if lion hunt prices were increased from the current SVC price of US$53,700 (Zambezi Hunters 2010), or the Zimbabwe average of US$51,918 to the African average of US$70,115 (Booth 2009), at a harvest rate of 3% lions would not be any more profitable. Before applying this model, elsewhere, it should be parameterised by local values of all variables, which might influence findings. Lion hunting is an important income generator in Africa hunting concessions (Booth 2009), especially in arid areas without mega-herbivores and buffalo, and where leopards occur at low densities (Stander 1998; Martin 2008). If lions were listed on CITES Appendix 1 this would impose severe restriction on hunting lions and essentially terminate this avenue of income generation. Such a listing would have major implications for management decisions in private wildlife and communal areas, where other interventions (including poisoning) may be employed to reduce lion densities to protect populations of herbivores (both wild and domestic).

Overutilization of leopards was possibly occurring in SVC. Leopards, like lions, are susceptible to overharvesting of adult males as they are an infanticidal species (Packer *et al.* 2009; Packer *et al.* 2011). In SVC the high current abundance of leopards may be as a result mesopredator release owing to low sympatric lion abundances. However, a higher lion population, combined with sustained high hunting pressure, is likely to result in a decline in leopard abundance. Thus in areas where leopard hunting predominates as an economic activity, it may be advisable to regulate lions at a level where they do not impact additionally on the leopards.

4.4 Management implications

Due to the relatively high costs associated with lion predation, landowners in wildlife production systems or rural communities co-existing with lions should consider generating income from lions in other ways. High quality ecotourism operations in areas of exceptional scenery and wildlife resources have clear economic potential, and should be encouraged wherever possible (Barnes 2001). Lions are one of the cornerstones of the photo-tourism industry worth substantially more alive than dead in most areas (Thresher 1981). However, photo-tourism is susceptible to political instability (Reid 1999), and is often not viable in areas lacking high densities of wildlife, scenic splendour, client safety or adequate infrastructure (Krüger 2005). Zimbabwe has been politically unstable for an extended time period, and there is currently little photo-tourism demand or suitable tourism infrastructure in SVC.

Consequently, to allow wildlife-based land uses to compete with alternative options (e.g. livestock ranching or agriculture) it is important that landholders and communities are able to utilize wildlife to generate sufficient income to offset the costs of wildlife. This may include well managed sustainable trophy hunting, which in many areas is the only viable means of generating income from wildlife (Child 1996). Ultimately the responsibility to decide how many lions should occupy a private area lies with landholders. This model is applicable anywhere in the world where large carnivores live on private or rural land, but because of their size and preferred prey is particularly relevant to areas with African lions.

In private or communally owned wildlife areas, management of larger carnivores may be necessary to maximize other returns (Packer *et al.* 2009). This may in turn create favourable opportunities that ensure the persistence of competitively inferior and endangered large carnivores, and may even be justifiable on these grounds alone in some small state protected areas.

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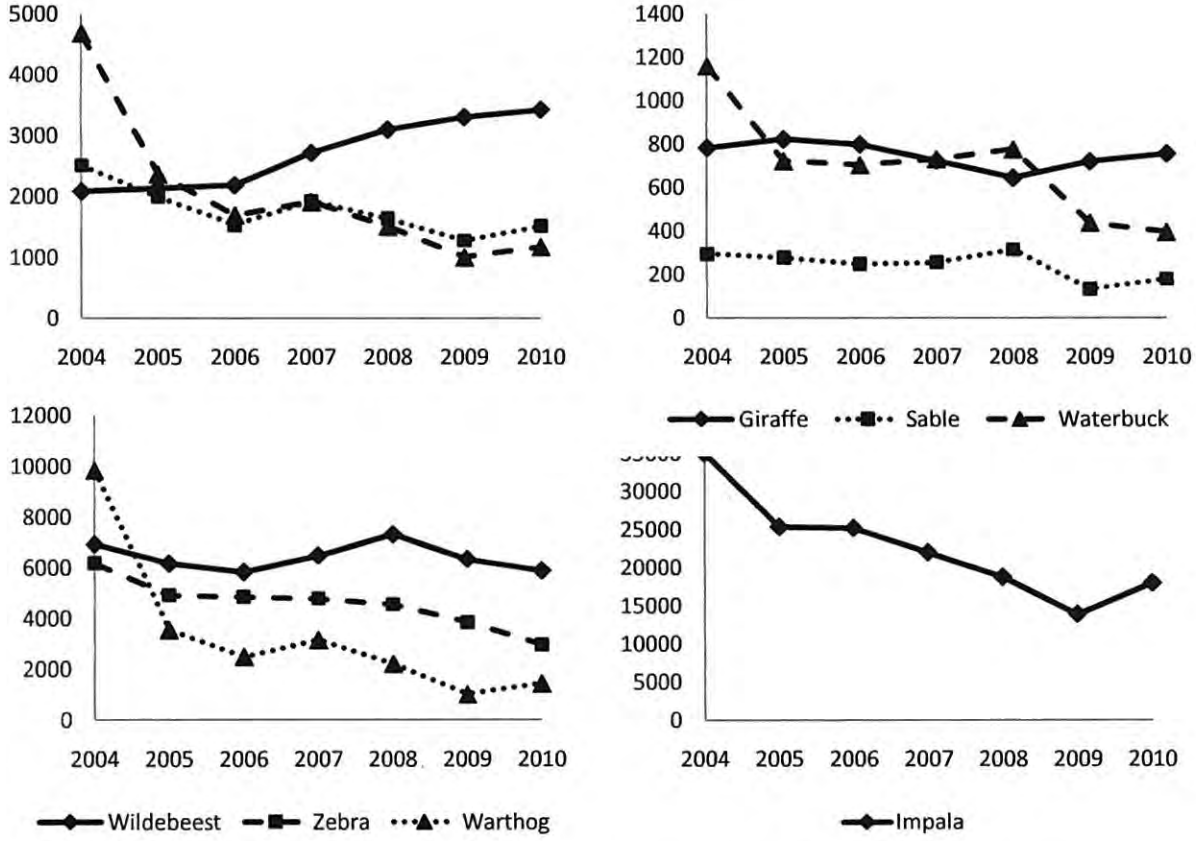


Figure 1. Population trends of ten key herbivore species in Savé Valley Conservancy from 2004 to 2010

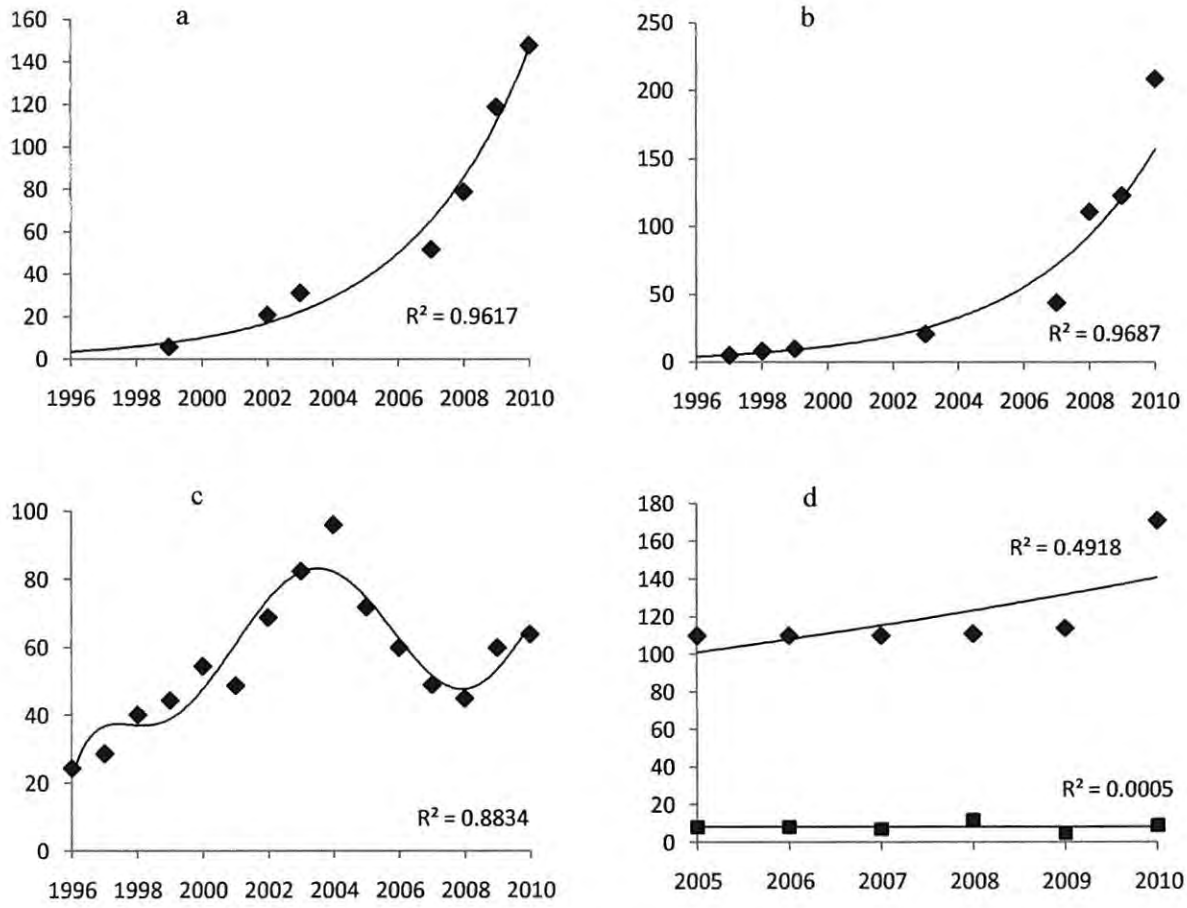


Figure 3. Population trends of a) lions, b) spotted hyenas, c) African wild dogs, and d) leopards (diamonds) and cheetahs (squares) in the Savé Valley Conservancy from 2000 to 2010. Best fit trend lines are fitted: exponential for lions, hyenas and leopard, polynomial order 6 for wild dogs and linear for cheetah

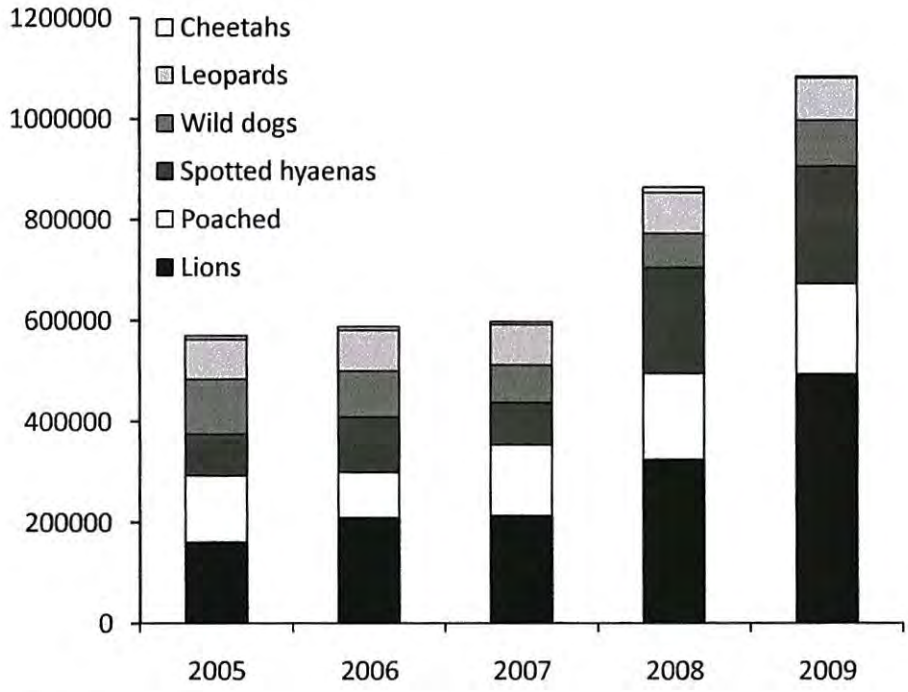


Figure 4. Stacked bar graph depicting the proportional economic losses in US dollars lost in the SVC to the five main predators and poaching from 2005 to 2009

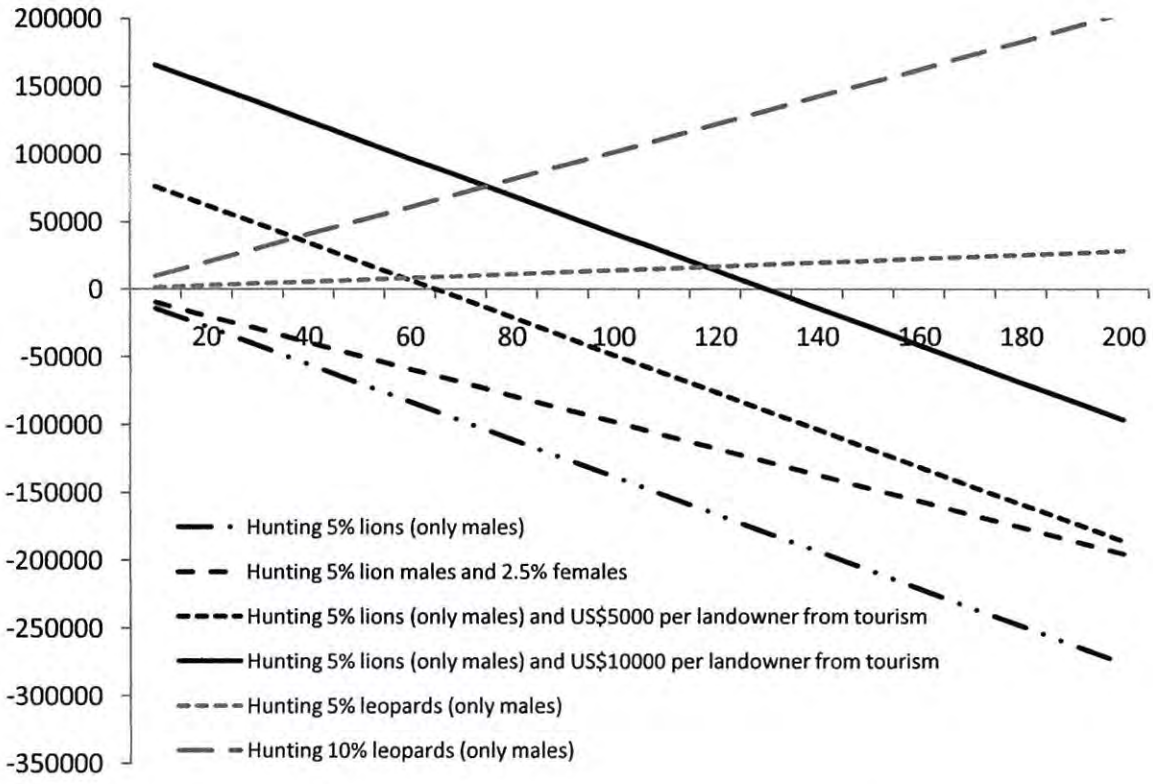


Figure 5. Projected net benefits of trophy hunting and photo-tourism based on 2009 trophy and day hunting fees for landowners in the Savé Valley Conservancy using various hunting offtake percentages. Number of individuals is displayed on the X axis.

Carnivore Densities in the Savé Valley Conservancy

Results of the 2017 Spoor Survey & Wild Dog Monitoring Project

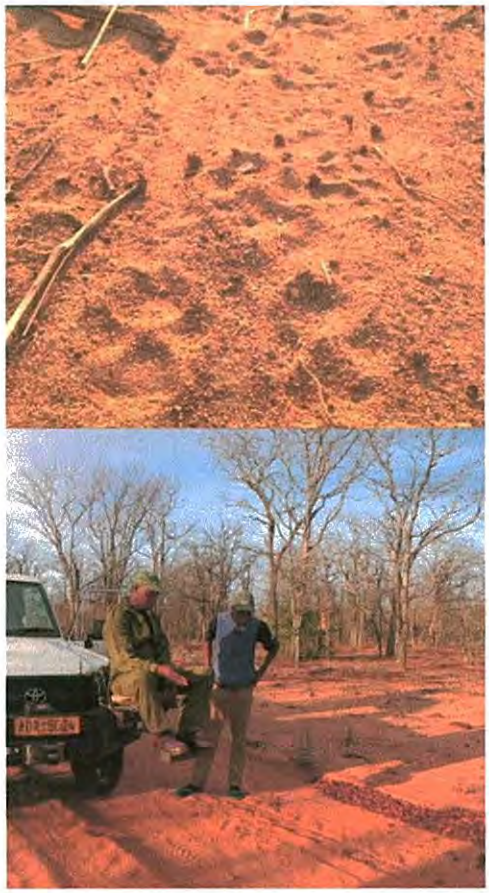
Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within 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) with strong correlations existing 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 2017 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.



AWCF head scout, Rueben Bote, and attachment student, Nkosilathi Ngwenya, identifying spoor.

Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (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 6-7km^2 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.

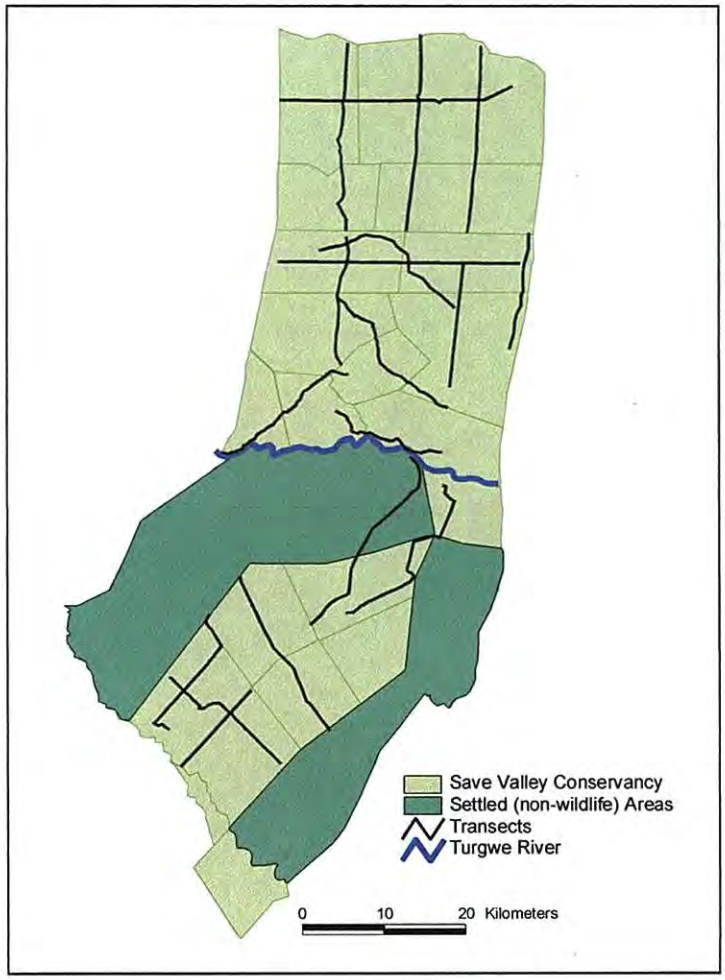
The total area of the Savé Valley Conservancy is 3490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2439km^2; 1639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.7 km, giving a penetration ratio of 6.31. In southern SVC, the combined transect length was 144 km, giving a penetration ratio of 5.56. For the conservancy as a whole, 403.7 km were driven (penetration ratio 6.04).

Transects surveyed were the same as those used in 2007-2017 (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 12.7 km and 29.2 km in length, with a mean transect length of 21.2 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 2017



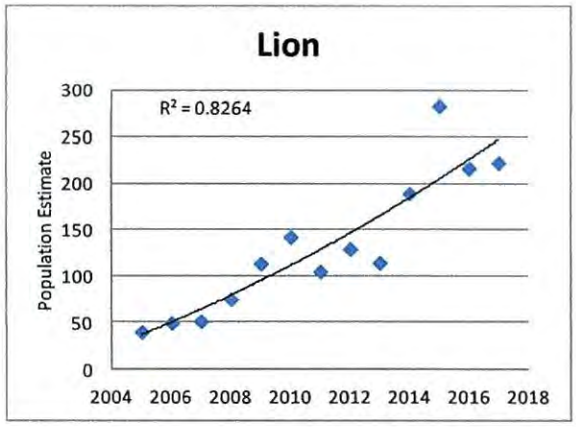
Results

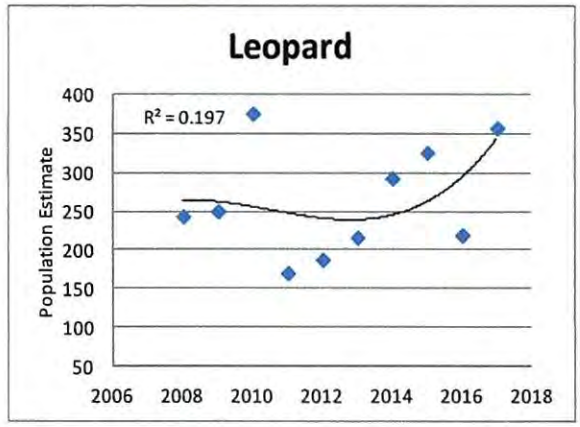
Table 1: Summary of survey parameters (2017)

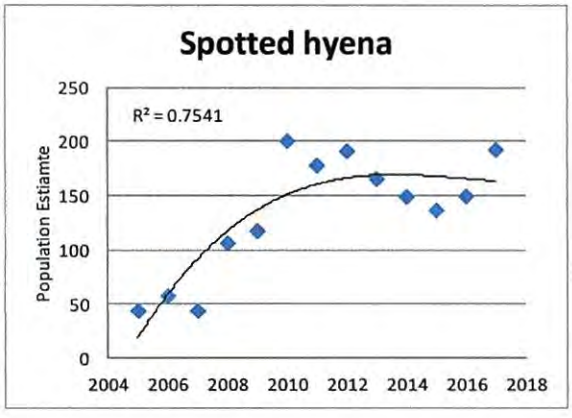
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

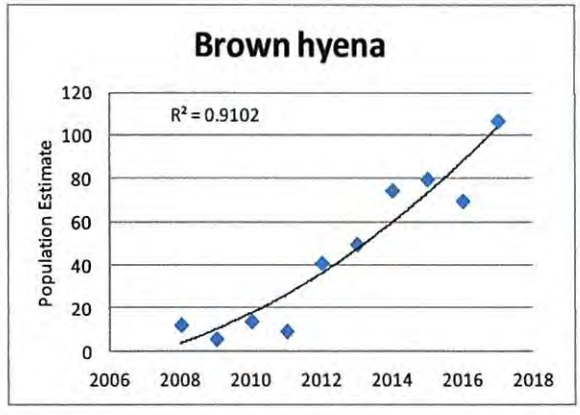
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs).

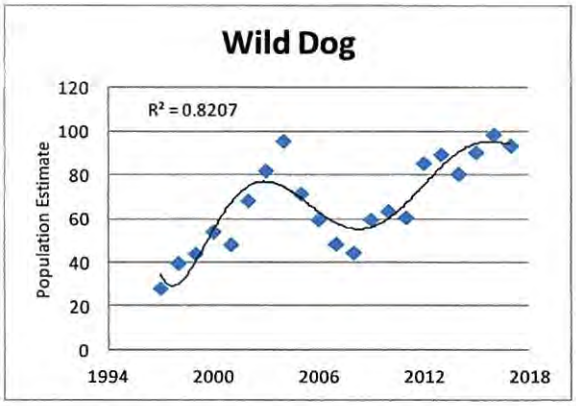
Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223
Leopard				245	252	378	172	189	218	295	328	221	359
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193
Brown hyena				12	6	14	10	41	50	75	80	70	107
African Wild dog				45	60	64	61	86	90	81	91	99	94
Black backed jackal				188	190	157	141	151	199	229	241	234	296











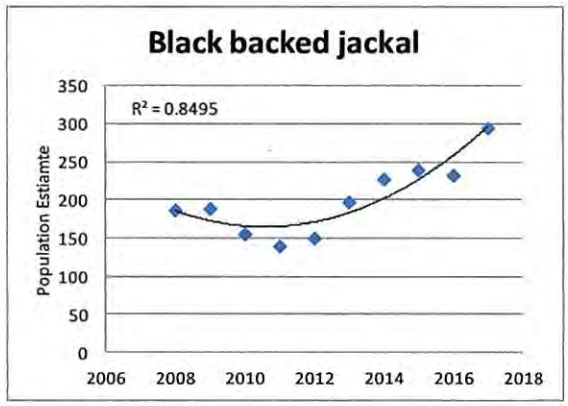


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results for each species are stable/increasing. The trend data suggests that 2016 was a slight undercount for all species (as was also the case in the Gonarezhou National Park survey), and that 2015 was most likely an over count for lion (and maybe for leopard).

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to be starting to stabilise. The population **estimate of 223 lions** in 2017 is in keeping with the long-term population growth trend (Figure 2), and the recent marginal increases in estimated individuals could be indicative of a slowing growth rate as the species approaches capacity within the conservancy.

The number of lions in SVC equates to a **density of 9.1 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 121 lion tracks we encountered, 31% were adult males, with 55% identified as adult females, 12% as sub-adults and 2% as young cubs. 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.

In 2017 there were an estimated **359 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2010 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a good and positive trend (Figure 2).

Leopards are at a **density of 14.7 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (9.5 / 100km²; Groom & Watermeyer 2017). Finally, the SVC leopard population appears to displays a 2:1 ratio skewed in the favour of females. Of the 85 leopard tracks

we recorded, 32% were adult males, 64% were adult females, with one sub-adult (1%) being recorded and three cubs (3%).

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. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. There were an estimated **193 spotted hyenas** in 2017. The hyena population could be doing better in light of the recently stabilising lion population, but we will need to monitor the population to determine if a true trend is emerging. Likewise, one must not overlook that the possible causes of the recent slight population decline between 2012-2016 (prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc.) may still be of consequence.

Spotted hyena's are at a density of **7.9 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 9.7 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2017). Given the relatively lower density of the species in the conservancy, they may still increase more.

There were an estimated **107 brown hyenas** in the conservancy in 2017. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **4.4 brown hyenas / 100km²** in 2017, which is higher than the average (2.5 brown hyenas / 100km²) over the last few years (2012-2015).

The **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 94 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²).** Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 313 wild dogs in the conservancy, with a density of 12.8 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

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, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time.

There has been a notable increase in the **black backed jackal** population in the conservancy, from an estimated 241 jackals in 2015 and 234 jackals in 2016, to **296 black backed jackals** in 2017. Overall, the jackal population is displaying a stable positive growth trend (Figure 2). The estimated density of jackals was **12.1 jackals / 100km²** in 2017.

We once again stress, that the spoor encounter rate for **cheetahs** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetahs, even with large confidence intervals. However, data from the spoor survey suggests there to be a minimum of **four cheetahs** in the whole

conservancy at a **density of 0.2 cheetahs / 100 km²**. This is on the low end of the spectrum when one considers the range of cheetah densities elsewhere (excluding highly managed fenced reserves in South Africa); for example, 0.2 cheetah / 100km² on Namibian farmlands and in the Sahara, and up to 2.5 cheetah / 100km² in the Serengeti National Park (IUCN/SSC 2015).

Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low (only two cheetah tracks were seen in the 403.7 km of transects driven). However, spoor surveys are not 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 collected updated photographic information on cheetah throughout Zimbabwe, estimates c. 12 adult cheetahs in SVC (van der Meer, 2016).**

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, although anomalous over and undercounts can hinder this. Likewise, we can trust the numbers for wild dogs, as they are from the detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give 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, using population figures directly from the graphs for these species is unadvisable.

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Acknowledgements

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Appendix 1: All Spoor Survey Results for All Species Counted (2017)

NORTH SVC Species	Survey Area North 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	1639	278.042434	Leopard (Y=0.6993X)	16.96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011
Brown hyaena	1639	92.3646238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484
Cheetah	1639	3.848525992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369
Civet	1639	759.0999784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569
Honey Badger	1639	119.1610431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147
Leopard	1639	291.2825499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916
Lion	1639	188.5777736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906
Spotted hyaena	1639	138.5469357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727
Wild dog	1639	277.0938714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453
African Wildcat	1639	22.06685984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421

SOUTH SVC Species	Survey Area South 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	800.57	27.21437644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111
Brown hyaena	800.57	16.95095785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0
Civet	800.57	233.2660838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667
Honey Badger	800.57	3.887768063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.694444444
Leopard	800.57	73.86759319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.19444444
Lion	800.57	38.98720305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.97222222
Spotted hyaena	800.57	55.9381609	Lion (Y=0.3049X)	6.987291667	144	33	4.363636364	144	5.559513889	22.91666667
Wild dog	800.57	44.0724904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0

TOTAL SVC	Survey Area	Est. population	Equation Used	Est. density	Distance covered	No. of spoor	Spoor frequency	Transect length	Penetration	Spoor density
	Total SVC	(Total area)	Stander1998	(Animals/100km2)	(km)	counted	(km/spoor)	(km)	(Area/length)	(Spoor/100km)
Species	(Km2)			Y=0.3049X	Sum of transects			Sum of routes		
				Y=0.6993X						
Black-backed jackal	2439	295.7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862
Brown hyaena	2439	106.8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429
Cheetah	2439	3.684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389
Civet	2439	980.1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714
Honey Badger	2439	118.2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448
Leopard	2439	359.11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904
Lion	2439	222.8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204
Spotted hyaena	2439	193.4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293
Wild dog	2439	313.1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808
African Wildcat	2439	21.12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473

RCVD OCT 16 2018

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

Huntington

(b) (6) [redacted]

CASHIER'S CHECK
The Huntington National Bank - Branch 320162
Columbus, Ohio 43219

Date 10/01/2018

Remitter SCOTT SOMERS

Pay One Hundred Dollars & 00/100 $ ** 100.00 **

To the Order Of US FISH AND WILDLIFE SERVICE

Drawer: The Huntington National Bank
Columbus, Ohio 43219

By _____
Authorized Signer

DRAWEE: The Huntington National Bank
Columbus, Ohio 43219

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CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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August 11, 2018

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

RE: Application for Permit to Import Sport-Hunted Lion Trophy, Ken Grosslight

Dear Chief Cogliano:

Enclosed please find one application for a permit to import a sport-hunted lion trophy from the Niassa Reserve Mozambique. We have included additional enhancement information in the DMA's files submitted by Conservation Force and Mozambique's Parks and Wildlife Management Authority, in making a positive enhancement finding for the applicant.

Please do not hesitate to contact us if you have questions about this application or need further information

Sincerely,

John J. Jackson III

Encl:

- Authorization of Representation
- Grosslight import permit application

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 Panthera Leo (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: K Grosslight

Name: Ken Grosslight

Date: 5/16/18

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD OCT 26 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Grosslight	Kenneth	Russell	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. business must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Blythewood	SC	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
N/A

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. 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.

Kenneth Grosslight — 5/16/18

Signature of applicant/Principal Officer 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: 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:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) 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

(4) 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 regular mail through the U.S. Postal Service.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo (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:
   Mozambique Niassa Reserve Hunting Block R3

   b. Date wildlife is to be hunted: 9/5/18 – 9/27/18 using Traditional bow and arrow.

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Safaris De Macam bigmee

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

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with: N/A

   c. 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).
   I have not hunted yet.

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: Simon Cate
Business Name: Safaris de Mozambique
Address: 138 North Beach Road
City: Westbrook
State/Province: KZN, RSA
Country, Postal Code: 4422

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?
   Please see attatched Typed sheet for answers to #9.

   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?

   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?

9 (a). The Niassa Game Reserve is estimated to hold 1,573 lions in 177,559 squared Kilometers (Riggio et al 2012). This is an increased number or lions from a previous study in 2006 that estimated 800-900 animals (IUCN SSC Cat Specialist Group). Also, an even earlier survey in 2002 estimated 500 lions in the reserve (Chardonnet). Chardonnet in 2008 reported that the lion offtake was very low nationally. He also speculates that there are more lions in Mozambique than previously thought. The BBC in an article from July 9, 2015, quoted Colleen Begg who is the head of the Niassa Carnivore Project as stating that the numbers of lions has increased secondary to increased food availability due to elephant poaching. Chardonet states that the "Niassa Game Reserve hosts the largest single population of lions in Africa" (Conservation Status of the lion in Mozambique, June 2012). He estimates 1-3 lions per 100 squared Kilometers.

Importantly, Mozambique has completed a "Conservation Strategy and Action Plan" for the African Lion (Beggs 2010). Lions are on a strict quota system in this country.

This National Reserve and Southern Tanzania, which borders the Reserve has the highest adverse lion-human encounters in all of Africa.

9 (b). The daily hunting fee includes license fees and some of these fees go to funding an anti-poaching unit. The trophy fee is $20,000, part goes to the government and 20-30% is returned to the community. The concession is classified as a community hunting area, the Outfitter has made an independent commitment to improve the lives of the local African people. The villages and communities on the concession receive the majority of the meat from the animals which are hunted on Safari. This not only provides these people with a vital source of protein but creates an incentive for the local communities to conserve the wildlife, ensuring that they continue to prosper from it in the future. The outfitter employs more than 50 people during the hunting season. The average Bread-winner to dependent ratio is 1-8, which means that on average the company supports more than 400 people directly through employment

To date, assistance to these communities has included the building and equipping of schools, and an administrative center, and the drilling of boreholes to provide villages with potable water. Motorbikes have been given to the local police by the company, to assist in their efforts with fighting crime and WILDLIFE crime.

9 (c). There is an active "Conservation Strategy and Action Plan" in the Niassa Game Reserve (http://www.niassalion.org/library_files/2010%20Mozambique%20Lion%20Conservation%20Strategy.pdf). This Outfitter goes to great length to try to make sure that any harvested lion is at least 6-7 years old judging by nose color, mane configuration etc. The Outfitter is increasing his full time, year-round anti-poaching unit from 12 to 20 scouts with funds from this hunt. Safaris de Mozambique (the outfitter) is 100% committed to the conservation of wildlife. They are well aware that the future of the community, the company and the Ecosystem of the concession is very much defendant on the management of the wildlife resource, and through investment and a sustainable land use model they plan to ensure this future is secure.

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 5/16/18

    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.

All international shipment(s) must be imported 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).

[redacted] (b) (6)

04-96

[redacted] (b) (6)

613

5/16/18
Date

Pay to the Order of US Fish and Wildlife Service $100.00

One hundred dollars Dollars

TD Bank
America's Most Convenient Bank®

For [redacted] (b) (6)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER

CITES PERMIT N.º MZ_0062/2019

ORIGINAL

2. Valid until: 10/08/2019

3. Consignee (Name and address)
KENNETH GROSSLIGHT
C/O SPLITTING IMAGE TAXIDERMY
THE HAVEN FARM - GRAHAMSTOWN
6140 EASTERN CAPE PROVINCE

3a. Country of destination: Z A

4. Permitee (name and address, country)
SAFARIS DE MOÇAMBIQUE
AVENIDA DA LIBERDADE - C.P.433
TETE - MOÇAMBIQUE

5. Special conditions
Personal sport hunted trophy
For live animals, this permit or certificat is only valid if the transport conditions comform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations.

5a. Objective of the operation (See reverse): H

5b. Security stamp N.º: MZ_1590794

6. Name, address, national seal/stamp and country of Management Authority
REPÚBLICA DE MOÇAMBIQUE
ADMINISTRAÇÃO NACIONAL DAS ÁREAS DE CONSERVAÇÃO
AUTORIDADE ADMINISTRATIVA CITES
TEL: 21 302362 - FAX: 21 302363

	7/8. Scientific name (genus and species) and common name of animal or plant	9. Description of part or derivative, including identifying marks or numbers (age/sex if live)	10. Appendix N.º and source (see reverse)	11. Quality Number of Specimens and/or net Weight (KG)	11a. Total exported/ /Quota
A	Panthera leo melanochaita Lion		W.II	01- Skull	
B	Panthera lec melanochaita Lion		W.II	01- Fullmount	
C	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX				
D	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX				
E	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX				

	12. Country of origin*	Permit N.º	Date	12a. Country of last re-Certificate n.º	Date	12b. N.º of the operation ** or data of acquisition ***
A	MOÇAMBIQUE	MZ_0062/2019	10/02/2019			
B	MOÇAMBIQUE	MZ 0062/2019	10/02/2019			
C						
D						
E						

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)

** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial porpuses

*** For pre-Convention specimens

13. THE PERMIT IS ISSUED BY:

Place: MAPUTO

Date: 10/02/2019

FRANCISCO AUGUSTO PARIELA
MOÇ -CITES
Signature and title

1590794

14. EXPORT ENDORSEMENT:

See block 7	Quantity
A	
B	
C	
D	
E	

Port of Export | Date | Signature | Official seal and title

I.N.M. E.P.— 336

CITES PERMIT N.º MZ_0062/2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD OCT 26 2018 LS

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LONG	DANNY	P	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

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 #; no P.O. Boxes)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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.

Danny P. Long — 10/16/2018

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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.

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

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Panthera Leo Melanochaita, Lion / Eqqus quagga, Zebra

   b. Sex (if known). Male / 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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:
   Farm Vorstershoop, 8615, Dr RSM, North West, South Africa

   b. Date wildlife was hunted: 08/21/2018

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

Japie Horn
HORNS AFRICA SAFARIS
GG van Schalkwyk

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 foreign export/re-export document]:

Trophy Solutions Afica
11 Sixth Ave
Polokwane 0699 SOUTH AFRICA

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).

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:
Business Name: TROPHY SOLUTIONS AFRICA
Address: 11 Sixth Ave
City: Polokwane 0699
State/Province: SOUTH AFRICA
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

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, local community, or government?
The farm is the only employer for locals in that region.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: Danny P. Jong Date: 10/16/2017

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 governments 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 shipments 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).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 45842

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 20 / 08 / 2018 Terminated 25 / 08 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: GG VAN SCHALKWYK

Business Address: FARM KORSTERSHOOP

KROTH,

NW Code: 2815

ID No: 8309175044 087

PH Permit No: 05/10/2017 NW

Date: 23/5/18 Signature:

CLIENT

Name: DANNY PAUL LONG

Permanent Postal Address: [redacted] (6) (b)

ROAD [redacted] (6) (b)

[redacted] OKLAHOMA Code:

Country USA

Passport No: [redacted] (6) (b)

Email: [redacted] (6) (b)

Date: 25/08/18 Signature:

HUNTING OUTFITTER

Name: GG VAN SCHALKWYK

Business Address: FARM KORSTERSHOOP

CAMP B, KROTH Code: 2815

I.D. No: 8309175044 087

Tel No: 083 260 4234 Fax No:

HO Permit No: 024/10/2017 NW

Date: 25/08/18 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
KORSTERSHOOP	DR RSM	MR BOTHA	NW 108/ 2014	21/8	LION	1		✓	FULL MOUNT
R180/551231		FARM SMALDEEL		23/8	ZEBRA	1		✓	FLAT SKIN
5089 084		THEUNISSEN, OFS							
		9410							

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy
Total:

Copies: Client Original White
1st Copy Pink
Hunting Outfitter 2nd Copy Blue Forward to Nature Conservation Authority where hunt took place
Taxidermist 3rd Copy Green Retain for a period of three years
Professional Hunter Last Copy Yellow Taxidermist
Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

DRSM 00918/8/2018 NW 5126/08/2018 Application ID 5126

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Biodiversity North West Integrated Permit Ordinary Hunt, Release .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No 12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974

APPROVED SPECIES AND NUMBERS RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details

Surname:	Long
Full Name:	Danny Paul
Id Number:	
Passport:	457173239
Cell Home:	0722087756
Tel Home:	
Tel Work:	
Fax Home:	
Email:	bothachris12@gmail.com

Physical Address

Building:	
Street:	(b) (6)
Suburb:	Paul's Valley
Town:	Oklahoma
Area Code:	(b) (6)
Division/Region:	Oklahoma
Province/State:	USA
Country:	USA

Postal Address

Post Office:	
Town:	
Postal Code:	
District/Region:	
Province/State:	
Country:	

REGION

NorthWest

LOCATION

Facility

Property

Property Name:	Farm Vorstershoop
Building:	
Street:	Farm Vorstershoop Vorstershoop
Suburb:	
Town:	VORSTERSHOOP
Area Code:	8615
Division/Region:	Dr RSM
Province/State:	North West
Country:	South Africa

Stamp if applicable

15 Aug 2018, 09:38 AM

Stamp of Issuing authority

VALIDITY PERIOD

FROM 15/08/2018 TO 14/08/2019

Permit holder / Dealer

Signature of Issuing Authority
(Borho Matiganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

PROPERTIES

Name	Town	Province	Country
Farm Vorstershoop	VORSTERSHOOP	North West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	1	Male	None

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
Gabriel Gerhardus Van Schalkwyk	065/10/2017NW	0832604234	

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
Gabriel Gerhardus Van Schalkwyk	024/10/2017NW	0832604234	

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
Danny Paul Long	(b) (6)	20/08/2018	31/09/2018	(b) (6) Pauls Valley, Oklahoma, (b) Oklahoma, USA, USA

ACTIVITIES

Activity Name
Hunt
Release

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and . - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) An authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be refunded

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to

Signature of Issuing Authority
(Bartho Manganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

hunt an animal, d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof, e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present, f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this

HUNT - STANDARD REQUIREMENTS

1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use - a) a fire-arm having a barrel of a calibre of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, ovale, or water buck unless authorised in the restricted activities, b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties associated with the permit holder.

Signature of Issuing Authority
(Borho Manganye)

15 Aug 2018, 09:38 AM

Signature of Permit Holder
(Danny Paul Long)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: NW 5126/08/2018

Details of Hunting area: Name, Size and Ownership
WD Botha, Vorstershoop farm, VORSTERSHOOP ,8615 , District: DR RSM , -Camp B

I hereby acknowledge that I am fully aware of the following:

1. This lion was bred in captivity
2. That this animal will be hunted in a confined area
3. That this lion was released in the hunting area a minimum of 96 hours prior to this hunt
4. That this hunt may not be recorded as a wild or free roaming hunt

Signature of Client (Hunter) — Date

Signature of Professional Hunter No 1 — Date

Signature of Professional Hunter no 2 — Date

Signature of Hunting Outfitter — Date

Signature of Landowner — Date

Department:
North West Provincial Government
Republic of South Africa

: Building
ırket Street
) Box 112,
yburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: NW 5126/08/2018

Name of Hunter, Home address, Tel Number and Passport / ID number

Danny Paul LONG : pp (b) (6)

(b) (6) Pauls Valley, Oklahoma (b) (6) Oklahoma, USA

Outfitter. Name & North West permit number

GG van Schalkwyk – HO 024/10/2017 NW

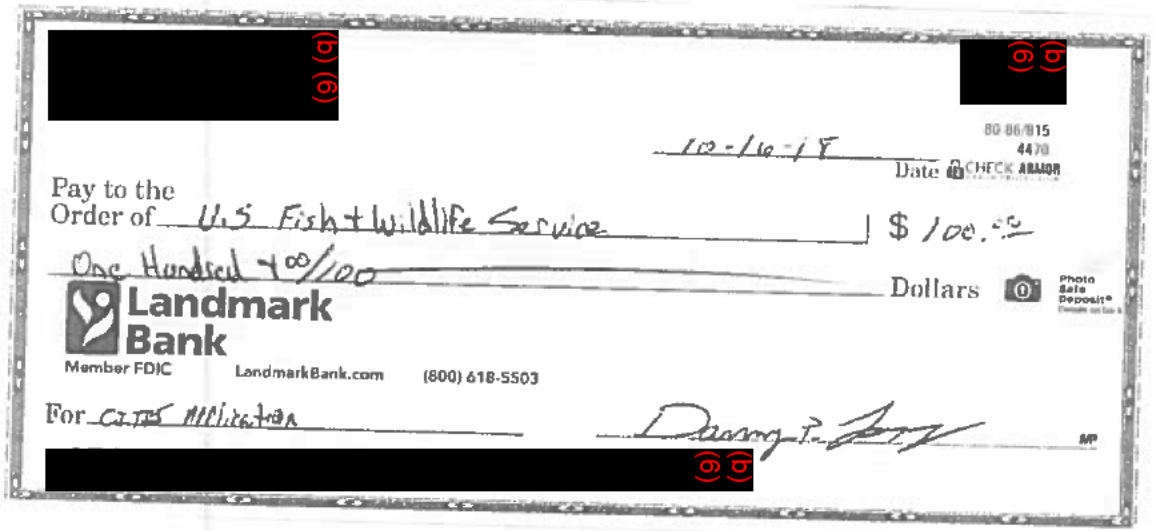
Prof Hunters. Name & North West permit number of the two (2) PH's conducting the hunt

GG van Schalkwyk – PH 065/10/2017 NW

Description of animal Sex, Age, Origin (Docs e.g, Transport. Keeping & Import) and exact date and time released

1 x male lion

Vorstershoop farm, Camp B



(6) (6)

(6) (6)

80-86/815
4470

10-16-18
Date CHECK AMADOR

Pay to the
Order of U.S Fish + Wildlife Service $ 100.00

One Hundred 00/100 Dollars

Photo Safe Deposit®

Landmark Bank
Member FDIC LandmarkBank.com (800) 618-5503

For Cates Mitigation

(6) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD OCT 30 2018

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Infante	Juan	C.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	4. Alternate Telephone Number	5. Email address
(b) (6) [redacted]			

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 #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Medina	Texas	(b) (6) [redacted]		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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) 10/24/2018

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 a trophy 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 4-6 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.

(b) (6) Laredo, TX (b) (6)

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

LUIS PEREZ, (b) (6)

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO / LION

b. Sex (if known).

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

SOUTHAFRICA

b. Date wildlife was hunted:

January, 2012

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

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 foreign export/re-export document]:

MEXICO, NUEVO LAREDO, TAMAULIPAS

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).

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:	
Business Name:	Juan C. Infante
Address:	Km. 48.5 Carretera Federal, México -Pachuca S/N
City:	Los Reyes Acozac
State/Province:	Tecamac
Country, Postal Code:	Estado de México

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

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, local community, or government?

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 10/24/2018

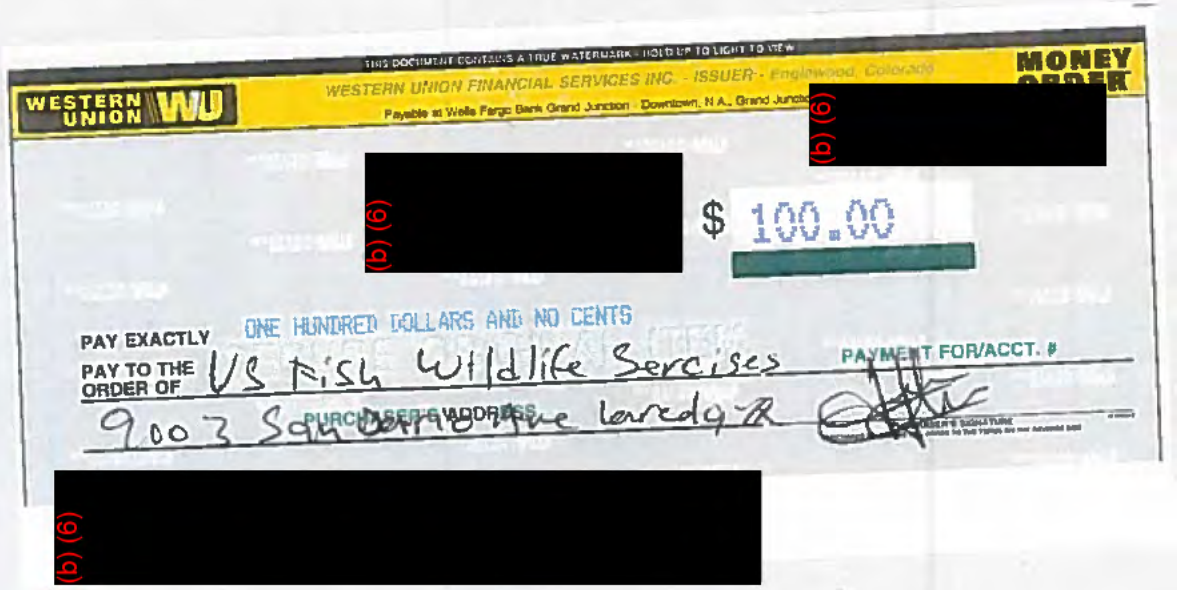
11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 10/24/2018

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 governments 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 shipments 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).



THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

WESTERN UNION WU

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER - Englewood, Colorado

Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junc

MONEY ORDER

(b) (6) [redacted]

(b) (6) [redacted]

$ 100.00 [redacted]

PAY EXACTLY ONE HUNDRED DOLLARS AND NO CENTS

PAY TO THE ORDER OF US Fish Wildlife Services

PAYMENT FOR/ACCT. #

PURCHASER'S ADDRESS 9003 Sam Bell Drive Laredo TX

PURCHASER'S SIGNATURE

(b) (6) [redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

R LP

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Behrns	Donald	Eugene	Mr.
(b) (6)			

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 (include if different from physical address, include name of contact person)			
(b) (6)			
1.b. City	1.c. State	1.e. Country	
Bruce	South Dakota	USA	
2.a. Mailing address (include if different from physical address, include name of contact person)			
(b) (6)			
2.b. City	2.c. State	2.f. Country	
Bruce	South Dakota	USA	

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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)

Donald E Behrns 10-24-2018

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 a trophy 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 4-6 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.

Donald E Behrns
(b) (6)
(b) (6)
Bruce, SD

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

Donald Behrns (b) (6)

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

panthera leo

b. Sex (if known). female

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

South Africa Reitzdale DrRGM MJ Erwee
Farm 239 Lenresdeel, Tosca
Nora-West

b. Date wildlife was hunted:

23/04/2017 – 27/04/2017
Killed 26/04/2017

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

Reitzdale Farm 239 PH JL Griesel
Leniesdeel, Tosca Outfitter MJ Erwee

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 foreign export/re-export document]:

Karoo Taxidermy 15 Vander Biji Street, Industrial Ar
P.O. Box 231
Graaf-Reinet, 6280 South Africa

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).

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:
Business Name: Karoo Taxidermy
Address: 15 Vander Biji street Industrial area
City: Graaff-Reinet
State/Province: South Africa
Country, Postal Code: 6280

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

NO - See attached pages (1) & (2)

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, local community, or government?

$6000 don't know what funds will be used for See pages (1) & (2) attached

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

I do not - I have no information on th
use of the funds but I can tell you thi
hunt was exceptionally hard and 100%
total fair chase - Tracked for 41 Kilomet
over a 3 day period - If it helps some one el
have an experience like this it is the essenc

RE: Lionesss

From: Carla Vd Vyver (carla@truevb.co.za)

To: (b) (6) [redacted]

Cc:

Date: Tuesday, October 23, 2018, 3:43 AM CDT

Good day Mr Behrns.

Thank you for your patience in this regard.

- The lions that were hunted were not removed from the wild. They were captive bred animals from registered breeding, keeping and hunting facilities. (Copies of relevant government issued permits is available and attached.)

- African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

  - 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

  - 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments - Biodiversity Management sections, for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits. I cannot speculate on how the government appropriates the income they receive from permits and licences

    - § In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released

for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

§ In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities..

o 9c)The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organisation that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

I trust that this information will be of assistance to you application.

Please feel free to contact me, should you need any information.

Kind Regards / Vriendelike groete

Mrs./Mev. Carla (A.C.) van der Vyver

Director / Direkteur: CVV ENVIRO

Tel: +27(0)83 756 0206

Vryburg,

South Africa.

DISCLAIMER: The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future. The signatory further accepts no liability whatsoever for any loss, whether it be direct, indirect or consequential, arising from this e-mail, nor for any consequence of its use or storage.

(2)

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

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 governments 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 shipments 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).

Permit Number 0 10535

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME OF ISSUING AUTHORITY	
NAME	READ
ADDRESS	Muni Garona Offices
ADDRESS	Molopo & Mooki St
PROVINCE	North - West

DETAILS OF PERMIT HOLDER

NAME	Donald Eugent	ID NO. PASSPORT NO	(b) (6) [redacted]
SURNAME	Belins	RESIDENTIAL ADDRESS	
POSTAL ADDRESS			
ADDRESS	(b) (6) [redacted]		Same
ADDRESS	Bruce rd		
ADDRESS			
TOWN	(b) (6) [redacted]		
POSTAL CODE			
PROVINCE	USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	M.S Erwee
NAME AND SURNAME : RESPONSIBLE PERSON	M.S Erwee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Reitzdale farm 239
PHYSICAL ADDRESS OF FACILITY	Leniesdeel, Tosca
DISTRICT	Dr KSM
PROVINCE	North - West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Female	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 09/04/2017 at 07h00 and hunt from 13/04/2017 at 07h00. Hunt one (1) captive bred female lion on the farm Reitzdale and transport the trophy to: Taxidermy, Graaff Reinet - East Cape

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	D Eugene Belins
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	JL Greeff
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	M.S Erwee
WEAPON AND METHOD OF HUNTING	375 Bow walk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	N/A
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 09/04/2017	TO: 08/05/2017	
RECEIPT NUMBER	R1150.00 - EB		
SIGNATURE OF ISSUING OFFICER:	[stamp]	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	05-04-2017		

blank

ADDRESS	Moloto & Nabo...
PROVINCE	North - West

DETAILS OF PERMIT HOLDER

Donald Eugene	ID NO	
Behrns	PASSPORT NO	[redacted]
...AL ADDRESS	RESIDENTIAL ADDRESS	
...S [redacted]	Same	
...ESS Bruce St		
...ESS [redacted]		
...N		
...STAL CODE		
...OVINCE USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

...ME AND SURNAME OF APPLICANT	MS Erwee
...ME AND SURNAME : RESPONSIBLE PERSON	MS Erwee
...ME AND SURNAME OF AGENT	
...YSICAL ADDRESS OF FACILITY	Reitzdale farm 239
...YSICAL ADDRESS OF FACILITY	Leniesdeel, ...
...STRICT	Dr KKM
...OVINCE	North - West
...GISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
...ion	Panthera leo	Female	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 09/04/2017 at 07h00 and hunt from ...8/04/2017 at 07h00. Hunt one (1) Captive bred female lion on the farm Reitzdale and Lichtpoint ... Taxidermy, Graaff Reinet - East Cape ... trophy to Larco

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

...N THE CASE OF INTERNATIONAL IMPORT / EXPORT:	
NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

...N THE CASE OF A HUNT:	D Eugene Behrns
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	JL Greesel
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	MS Erwee
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	375 Sauer, Walk
WEAPON AND METHOD OF HUNTING	

...N THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	N/A
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 09/04/2017	TO: 08/05/2017
RECEIPT NUMBER	R150.00 ...	
SIGNATURE OF ISSUING OFFICER:		SIGNATURE OF PERMIT HOLDER:
DATE STAMP:	05-04-2017	

...lank

DONALD E. BEHRNS
(b) (6)
BRUCE, SD (b) (6)

(b) (6)
78-0413/0914

10-24 2018

Pay to the Order of US Fish & Wildlife Service $ 100 00

One Hundred Only DOLLARS

Richland State Bank
602 First Street PO Box 338
Bruce, South Dakota 57220
(605) 627-5871

FOR lioness permit

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

NOV 6 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
mahaffey	william	howard	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Winter Park	Florida	(b) (6)		US

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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)

William Howard Mahaffey 10/31/2018

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 a trophy 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 4-6 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.

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

William Mahaffey (b) (6) [redacted]

3. 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?

☒ 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.

4. 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

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Shot in Zimbabwe, Masvingo Provence on Bubye Valley Conservancy. gps 011362. nearest town is Beitbridge.

b. Date wildlife was hunted:

July 11, 2018

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

Pete Fick Safaris. Professional Hunter Paul Zorn

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 foreign export/re-export document]:

Mazunga Safaris 8 Norfolk Road Hillside, Bulawayo, Zimbabwe

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).

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:	
Business Name:	Mazunga Safaris
Address:	8 Norfolk Road Hillside
City:	Bulawayo, Zimbabwe
State/Province:	
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

The Lion population on Bubye Valley Conservancy is astounding. They have ongoing scientific lion research taking place at all times.

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, local community, or government?

$100,000 some of the funds are used for anti poaching and scientific research.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

no

OMB Control No. 1018-0093
Expires 08/31/2020

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: _____ Date: 10/31/2018

    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 governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

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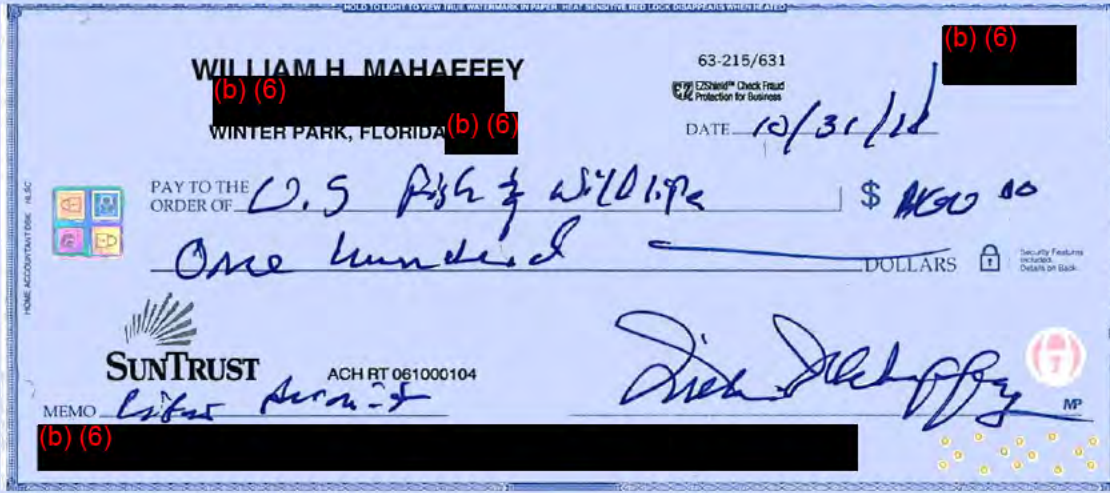
HOLD TO LIGHT TO VIEW TRUE WATERMARK IN PAPER. HEAT SENSITIVE RED LOCK DISAPPEARS WHEN HEATED
WILLIAM H. MAHAFFEY
(b) (6)
WINTER PARK, FLORIDA (b) (6)
63-215/631
EZShield™ Check Fraud Protection for Business
(b) (6)
DATE 10/31/12
PAY TO THE ORDER OF U.S Fish & Wildlife
$ 1500 00
One hundred
DOLLARS
Security Features Included. Details on Back.
SUNTRUST
ACH RT 061000104
MEMO Visitor Access
(b) (6)
MP
HOME ACCOUNTANT BSE
Security features. Details on back.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
mahaffey	william	howard	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Winter Park	Florida	(b) (6)		US

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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)

10/31/2018

Please continue to next page

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

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

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- 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 4-6 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.

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

William Mahaffey (b) (6) [redacted]

3. 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?

☒ 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.

4. 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

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Shot in Zimbabwe, Save Valley Conservancy. nearest town is Beitbridge. Savuli Hunting area.

b. Date wildlife was hunted:

Agust 20, 2016

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

Professional Hunter Paul Zorn

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 foreign export/re-export document]:

Collets Wildlife Artistry
15 Josiah Chinamano Road, Belmont
Bulawayo, Zimbabwe

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).

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:	
Business Name:	Collets Wildlife Artistry
Address:	15 Josiah ChinamanoRoad, Belmont
City:	Bulawayo, Zimbabwe
State/Province:	
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

The Lion population on Save Valley Conservancy is astounding. They have ongoing scientific lion research taking place at all times.

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, local community, or government?

$50,000 some of the funds are used for anti poaching and scientific research.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

no

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 an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

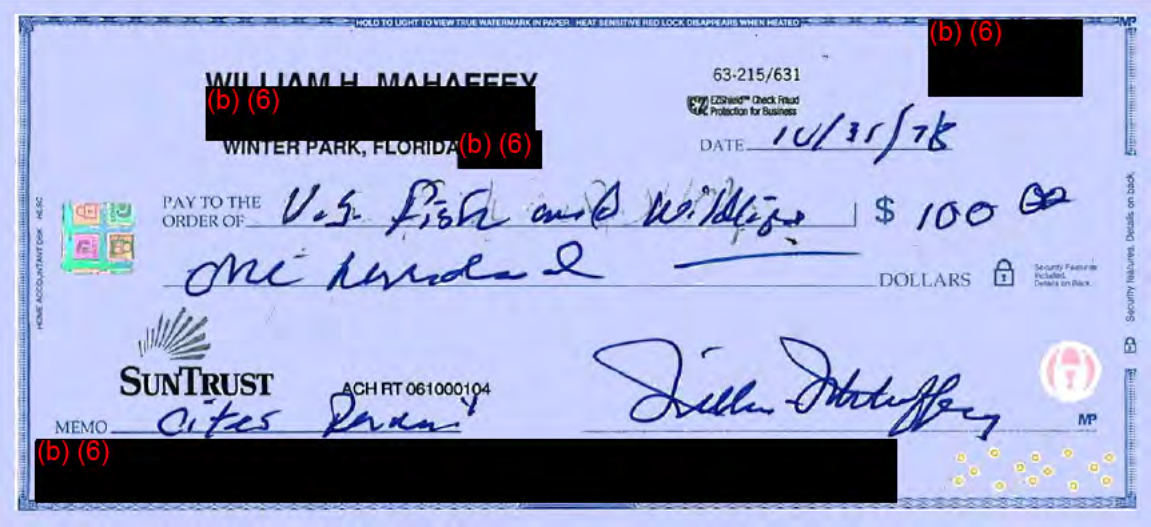
11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 10/31/18

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 governments 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 shipments 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).


HOLD TO LIGHT TO VIEW TRUE WATERMARK IN PAPER. HEAT SENSITIVE RED LOCK DISAPPEARS WHEN HEATED
(b) (6)
WILLIAM H. MAHAFFEY
(b) (6)
WINTER PARK, FLORIDA (b) (6)
63-215/631
DZShield™ Check Fraud Protection for Business
DATE 10/31/18
PAY TO THE ORDER OF U.S. Fish and Wildlife
$ 100 00
One hundred
DOLLARS
Security Features Included. Details on Back.
SUNTRUST
ACH RT 061000104
MEMO Cites Parks
(b) (6)
HOME ACCOUNTANT Disk HEAC
Security features. Details on back.

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.

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January 26, 2016

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dear Chief Van Norman:

RCVD JAN 28 2016

Enclosed please find four applications for permits authorizing the import of sport-hunted trophies of *P. l. melanochaita* from Zimbabwe. In evaluating these applications, please consider the information on lion conservation and management in Bubye Valley Conservancy, Save Valley Conservancy, and Zimbabwe on the whole already submitted by Conservation Force and others. An index of this information is attached to this letter.

The information submitted by Conservation Force demonstrates that the lion conservation and management program in Zimbabwe, and specifically in Bubye Valley and Save Valley Conservancies, enhances the survival of the species because it addresses the three main threats to lion: (1) loss of habitat, (2) loss of prey base, and (3) human-lion conflict, and more.

First, the information demonstrates that habitat would not otherwise exist for lion in Bubye Valley and Save Valley Conservancies but for the income generated by tourist safari hunting. Both conservancies rely on the income from tourist safari hunting to fund their operations. If hunting stopped, the 1.7 million acres of habitat protected in these conservancies are likely to be lost to the lion, rhino, and prey species.

Second, Bubye Valley and Save Valley Conservancies each engage in extensive anti-poaching operations that protect the lion's prey base. For example, in 2015, Bubye Valley Conservancy spent $590,000 on game scouts and anti-poaching. All of these funds were generated by tourist safari hunting.

Finally, the information shows the significant community assistance programs in place in each of these conservancies. Bubye Valley Conservancy and Save Valley Conservancy each contribute $100,000 annually to local communities in cash, services, game meat, and supplies. This support is used to build schools and clinics, maintain water infrastructure, assist with repairs and maintenance of equipment, fund school books and field trips, increase consumption of protein, and otherwise improve the quality of life for local residents. Because of these benefits, local people are more willing to tolerate lion, and human-lion conflicts are reduced.

We believe the information already in the Fish and Wildlife Service's possession satisfies the requirements of 50 C.F.R. § 17.40(r) for Zimbabwe. However, we will continue to submit information about the benefits generated by safari hunting as it becomes available.

Sincerely,

John J. Jackson, III on behalf of
Conservation Force

3240 S 1-10 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

Enclosures:

- Application submitted on behalf of Steven Chancellor for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of Kent Greenawalt for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of James Horrocks for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Application submitted on behalf of Jeffrey Smithers for a sport-hunted lion trophy to be hunted in Bubye Valley Conservancy, Zimbabwe
- Index of Documents Submitted

NEW INFORMATION ON THE AFRICAN LION

INDEX FOR: ZIMBABWE

No.	Title	Sent to FWS
1	Zimbabwe Parks & Wildlife Management Authority, Conservation Status of the African Lion (Panthera leo) in Zimbabwe (January 2015)	1/11/16
2	Zimbabwe Parks & Wildlife Management Authority, Age Restrictions on Lion Trophies and the Adaptive Management of Lion Quotas in Zimbabwe (2014)	1/11/16
3	Dr. Byron du Preez [Oxford], Bubye Valley Conservancy Lion Research Report (Jan. 12, 2016)	1/12/16
4	Blondie (Mazunga Safaris), Email re: Community Assistance Program in BVC (Jan. 20, 2016)	1/26/16
5	Blondie (Mazunga Safaris), BVC – Spreadsheet, Community Assistance 2011 & 2012	1/26/16
6	Zig, Photos of BVC Community Assistance Program	1/26/176
7	ZPHGA, Info on Lion Age Restrictions (Jan. 20, 2016)	1/25/16 Louis M 1/26/16 Us
8	Dr. Byron du Preez et al., Sport Hunting and Lion (Panthera leo) Conservation in Zimbabwe (Jan. 22, 2016)	1/26/16
9	Dr. Rosemary Groom, Lion Hunting in Zimbabwe's Save Valley Conservancy (Jan. 27, 2013)	1/26/16

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 JAN 28 2015

LP

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Smithers	Jeffrey	Davis	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)	(b) (6)	(b) (6)	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)	(b) (6)	(b) (6)	(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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
San Antonio	Texas	(b) (6)	(b) (6)	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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12US75980A/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): 01/20/2016

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:

      Zimbabwe: Bubye Valley Conservancy, Beit Bridge District, Matabeleland South. Nearest town is Beit Bridge and nearest city is Bulawayo. GPS coordinates for Towla are S 2126478 , E 02953162. Hunting area is a wildlife conservancy of 850,000 acres.

   b. Date wildlife is to be hunted:

      May 2016

   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).

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:	Steve Colletts
Business Name:	
Address:	15 Josiah Chinamano Road
Address:	
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

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 already provided by Conservation Force, Pete Fick/Bubye Valley Conservancy, and Zimbabwe authorities.

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: 01/20/2016

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.

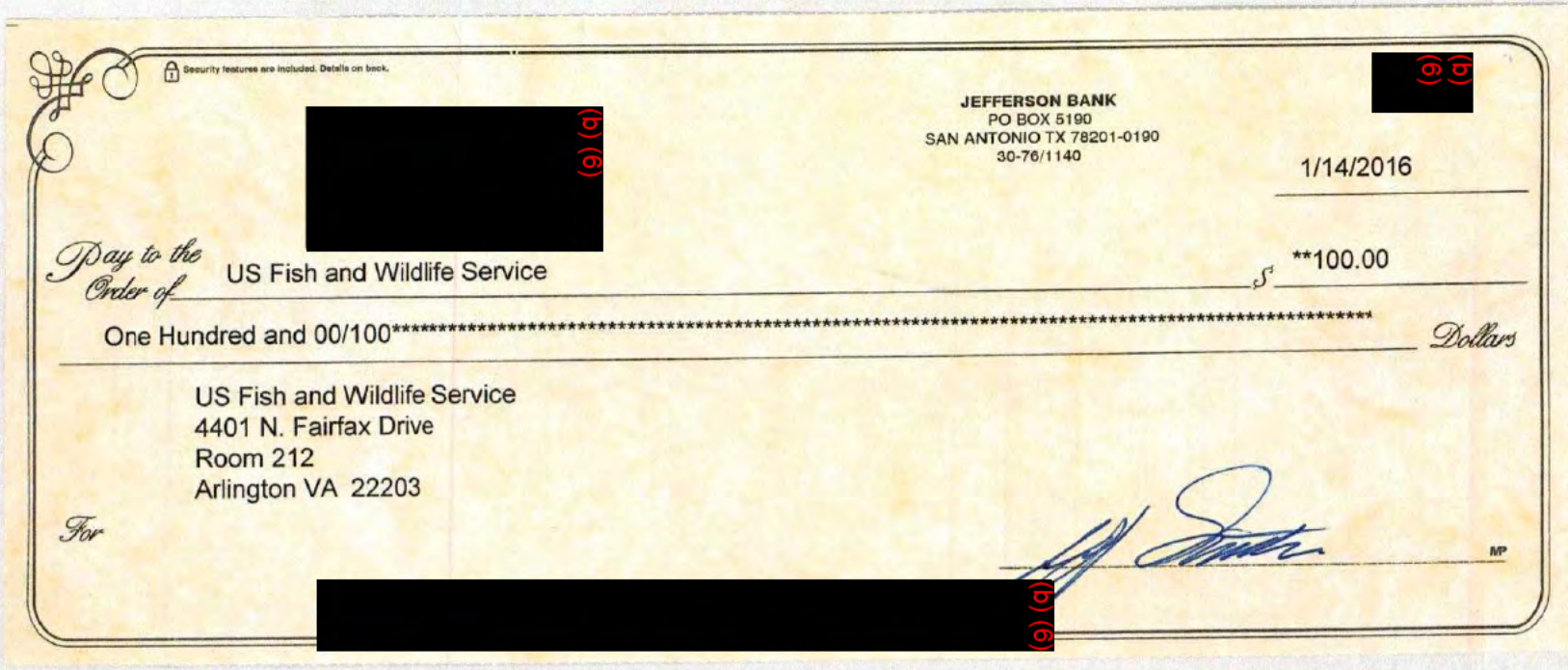
I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

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: JEFF SMITHERS

Date: 01/20/16



Security features are included. Details on back.

[redacted] (b) (6)

JEFFERSON BANK
PO BOX 5190
SAN ANTONIO TX 78201-0190
30-76/1140

[redacted] (b) (6)

1/14/2016

Pay to the Order of US Fish and Wildlife Service $ **100.00

One Hundred and 00/100********** Dollars

US Fish and Wildlife Service
4401 N. Fairfax Drive
Room 212
Arlington VA 22203

For [redacted] (b) (6)

MP

1-28-16

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

[1]Bubye Valley Conservation Research Initiative
[2]African Wildlife Conservation Fund
[3]Zimbabwe Parks and Wildlife Management Authority

January 31, 2016

*
† byron.d.dupreez@gmail.com
‡ rosemary@africanwildlifeconservationfund.org
§ omufute@zimparks.co.zw
¶ mandisodzar@gmail.com

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Summary of Steps Taken by Zimbabwe to Improve the Management of Lion Sport-Hunting

i – Banning of all lioness hunting in Zimbabwe
ii – Hunting moratoria around the Gonarezhou and Hwange National Parks
iii – Removal of fixed hunting quotas
iv – Age restrictions on sport-hunted lions
v – Scientifically-based adaptive quota management system

Summary of Lion Sport-Hunting's Contribution to Conservation

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land
ii – Lion sport-hunting generates up to US$ 557 km^{-2}
iii – Anti-poaching (in particular that of rhinoceroses) costs ∼US$ 216 km^{-2}

Introduction

The United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*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*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

Lions – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

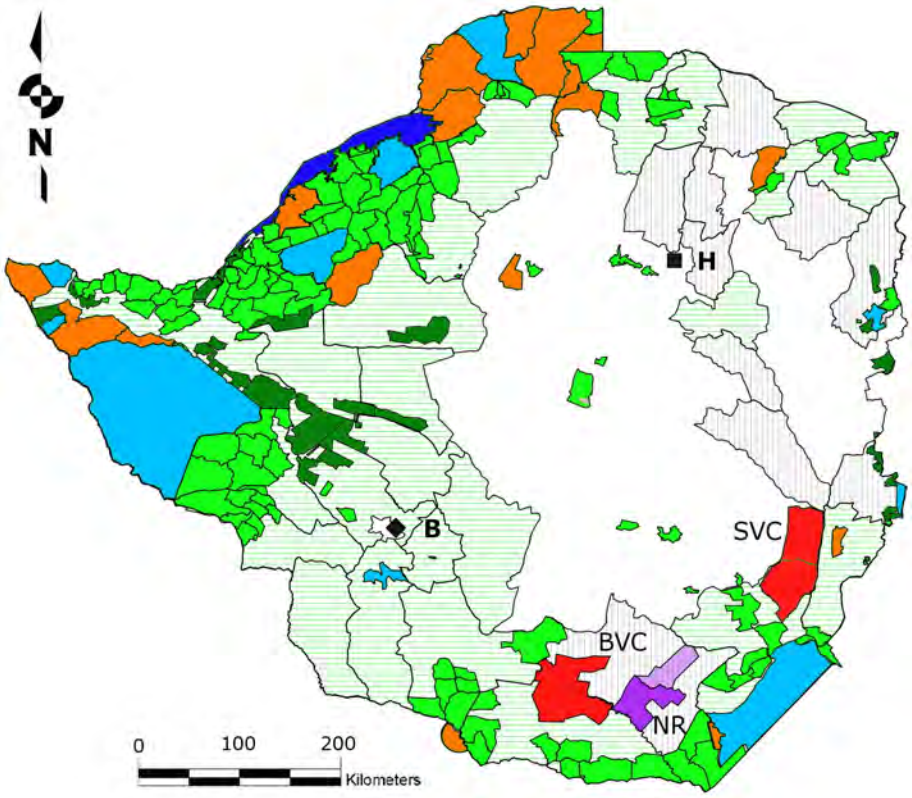

Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii*, *iii*, *iv*, *v*, *vii* & *viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

Conservation and Sport-Hunting

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

Zimbabwe's Adaptive Lion Quota Management System

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately \$150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

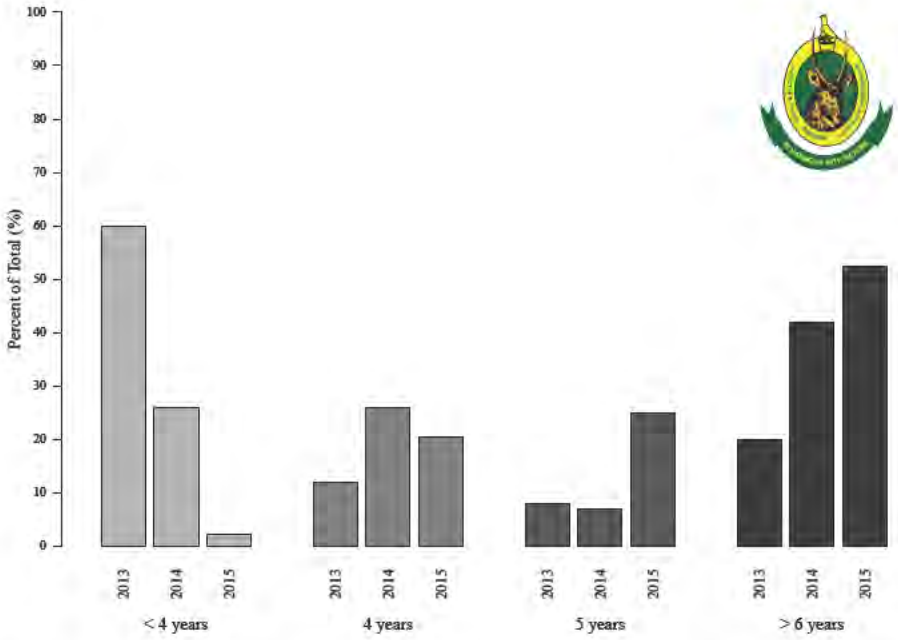

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

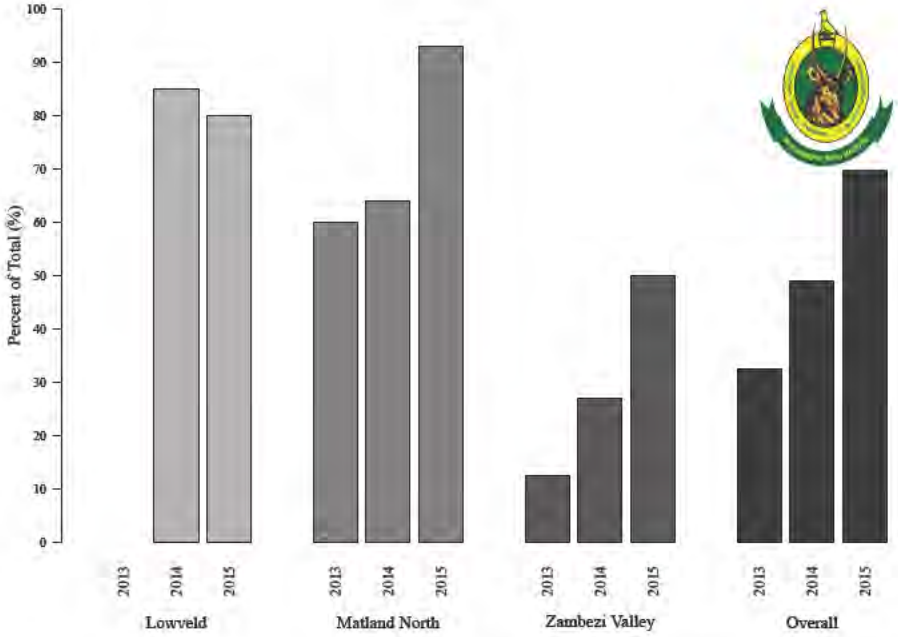

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

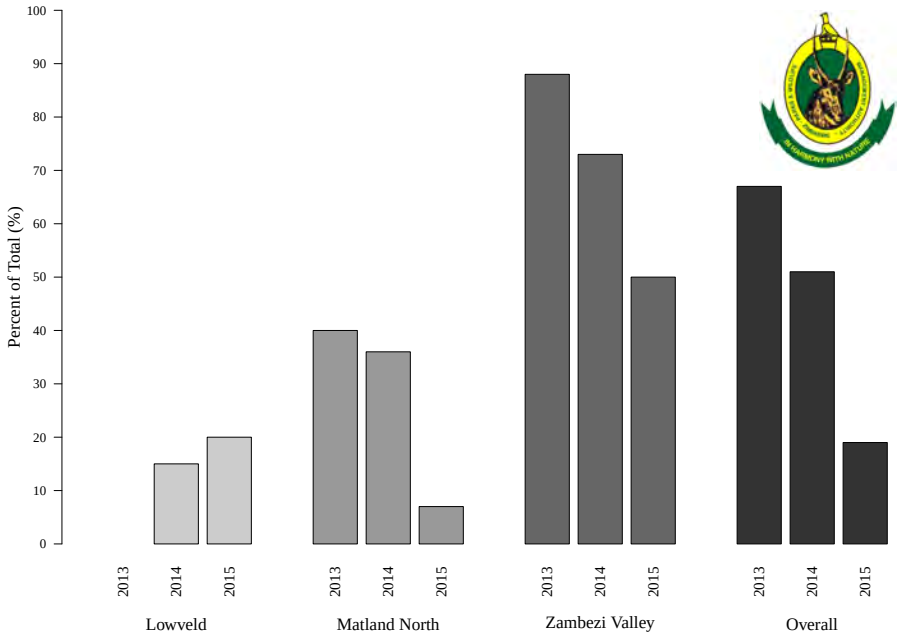

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People Injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	**44**	**183**	***2***	***7***

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

The Bubye Valley Conservancy

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (∼0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

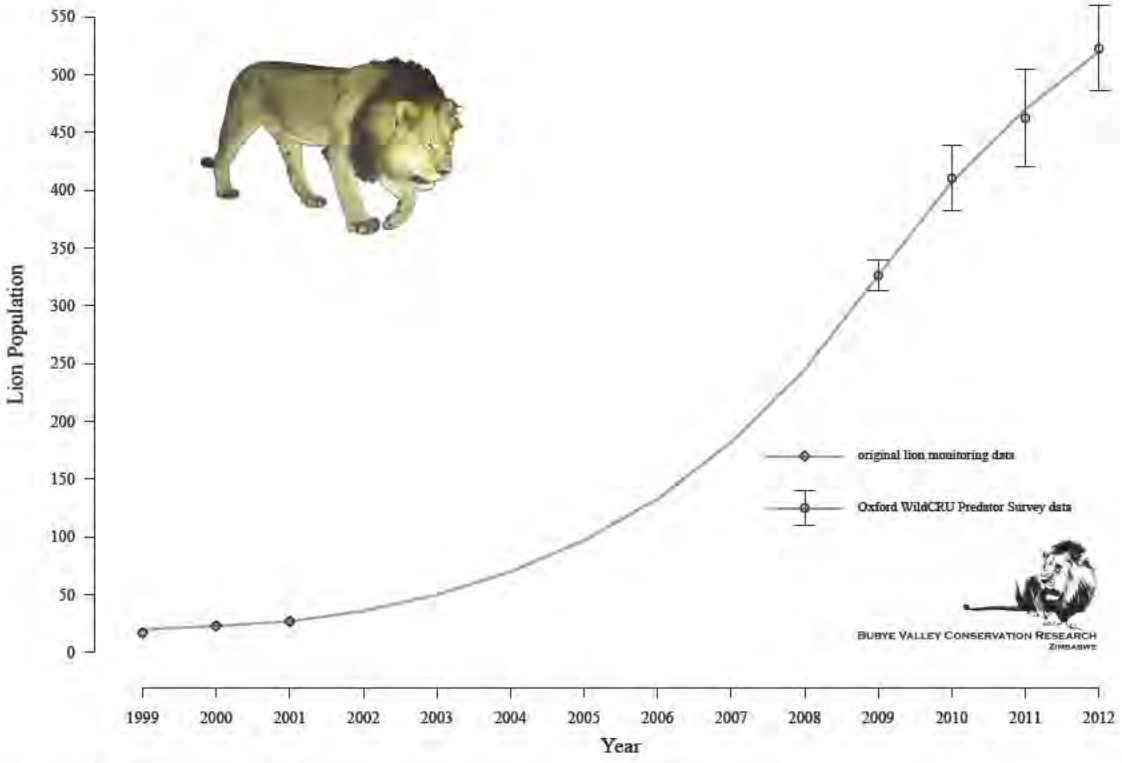

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water* - Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.* - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand errected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running* - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange - Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts* - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations* - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports* - Transport the soccor teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions* - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC* - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC* - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project* - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School - Supply of 24 loads of riversand to Mdzwiti School (value $1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

The Savé Valley Conservancy

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

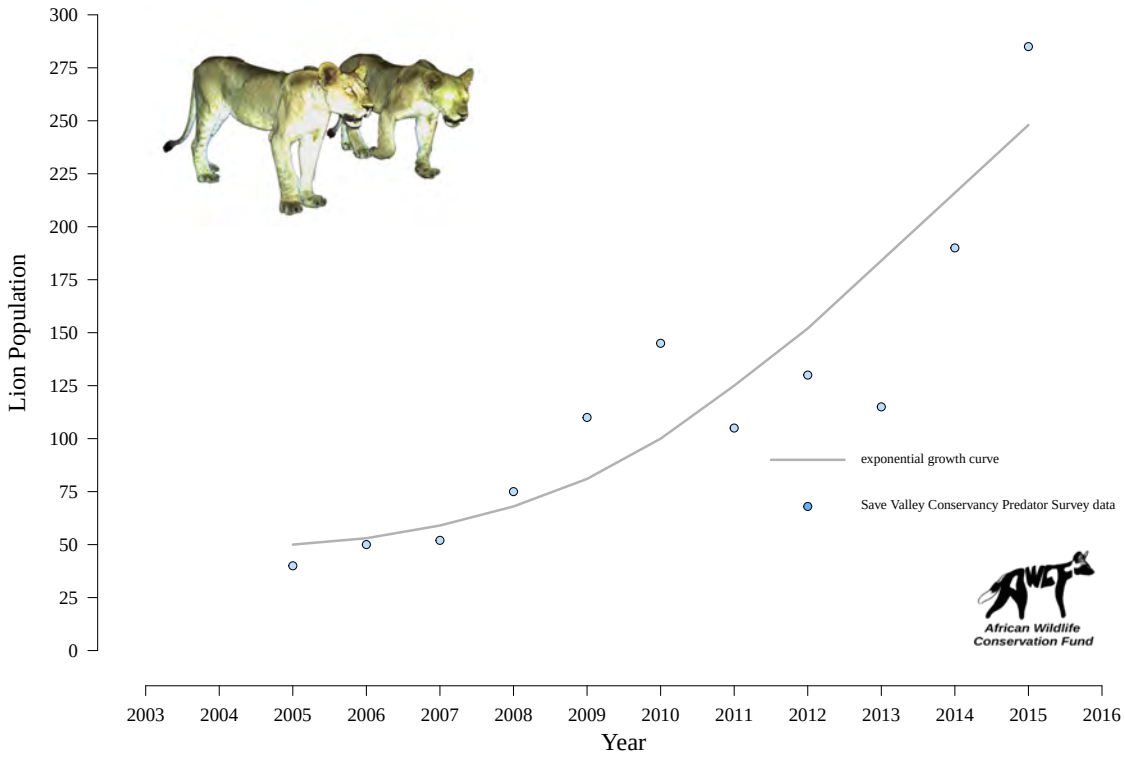

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

The Pros and Cons of Conserving Lions

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

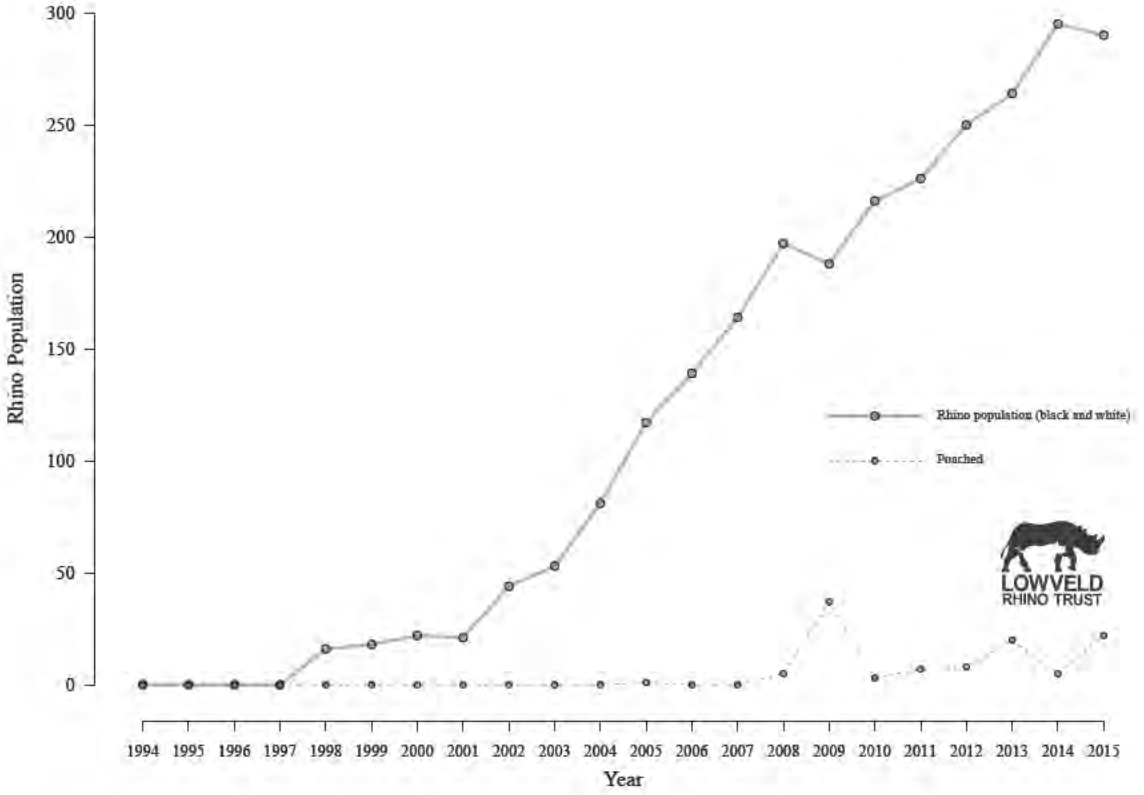

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

Where the Money Goes: The Finances of Lion Sport-Hunting and Reinvestment in their Conservation

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

Bubye Valley Conservancy - Lion Sport-Hunting Revenue Generated (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

Discussion

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

Conclusion

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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LION ZIMBABWE ESA TROPHY

Permit Number: MA86472B-0

Effective: 10/19/2017 Expires: 10/18/2018

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:

JEFFREY DAVIS SMITHERS
(b) (6)
SAN ANTONIO, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zimbabwe 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 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 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).

RCVD NOV 8 2018

To whom it may concern:

We are writing to explain the tardiness of Jeff Smithers' permit application and payment that was due on October 17, 2018. Please review the information provided and process the permit application without penalties or extra charges.

We were originally instructed to mail the application and payment to the Office of Law Enforcement in the Texas region, which as per Form 3-200-52 is Region 2 with a mailing address of 2545 W Frye Rd, Suite 8, Chandler, AZ 85224-6273. The application and payment were set via FedEx priority overnight on Tuesday October 16, 2018. FedEx tried to deliver the package on Wednesday October 17, 2018 at 9:52am, but were unable to deliver with the exception "customer not available or business closed". On Thursday October 18, 2018 we called the Office of Law Enforcement locate in Chandler AZ which went to a voicemail stating that this location no longer handles permit/license questions and that we would need to contact the Sacramento location. At that time we recalled the package with FedEx and would not get it back until Friday October 19, 2018.

Once we received the package containing the permit application and payment we reached out to the Sacramento, CA office to ensure the package was to be sent there as this was an application for the state of Texas. We left multiple messages starting Friday October 19, 2018 thru Tuesday October 23, 2018 requesting a call back to verify the correct mailing address. We received a call back on Tuesday October 23, 2018 in which we were instructed to send the permit application and payment to another address altogether with the Division of Management Authority.

We are now sending the permit application and payment to the Division of Management Authority (Branch of Permits, MS: IA) with the address of 5275 Leesburg Pike, Falls Church, VA 22041-3803 as instructed by phone, and would appreciate the application be processed without penalties or extra charges. We have provided the FedEx documentation that the original package would have arrived in Chandler AZ on the morning of October 17, 2018.

If you have any questions please feel free to call Cassie Drzymalla at (b) (6) [redacted]

Thank You

RCVD NOV 8 2018

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

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

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Smithers	Jeffrey	Davis	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
San Antonio	Texas	(b) (6)		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 indicated on pages 6 and 7.** 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 [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA86472B-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): 10/15/18

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend MA86472B-0.

2. Submit the original permit with this application.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: _____ Date: 10/15/18

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

7. All international shipment(s) must be through a designated port, unless otherwise authorized. 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 either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

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

9. 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 8. 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): Cassie DezyMalla

(b) (6) [redacted]

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.

Permit Number: MA86472B-0
Effective: 10/19/2017 Expires: 10/18/2018

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:

JEFFREY DAVIS SMITHERS
(b) (6)
SAN ANTONIO, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zimbabwe 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 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 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).

RCVD NOV 8 2018

Security features are included. Details on back.

(b) (6) [redacted]

Jeff Smithers
(b) (6) [redacted]

Jefferson Bank
PO Box 5190
San Antonio TX 78201-0190
30-76/1140

10/15/2018

PAY TO THE ORDER OF US Fish and Wildlife Service $ **100.00

One Hundred and 00/100********** DOLLARS

US Fish and Wildlife Service
~~Office of Law Enforcement~~ Branch of Permits
~~2545 W Frye Rd Ste 8~~ 5275 Leesburg Pike
~~Chandler AZ 85224-6273~~ Falls Church VA
22041-3803

MEMO

(b) (6) [redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

, 2018 LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Friesen	Kari	M	Ms.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Detroit Lakes	MN	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100. 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.

Kari Friesen — 11/05/2018

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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)?

   Brett Friesen (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Adult Lion

   b. Sex (if known). Female

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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

South Africa - Latitude -26.129304 Longitude 24.063442 - Reitzdale Concession - Tosco, South Africa (Nearest City)

   b. Date wildlife was hunted:

5-20-2018

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

JP Big Game Safaries Pty Ltd -Juan Pace - Postnetsuite 291, Private bag x 37, Lynwoodridge, 0040

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 foreign export/re-export document]:

FIELD AND STREAM TAXIDERMY PO Box 1256 - 3 Industria Road - Louis Trichardt - 0920
South Africa Tel: +27 15 516 1081 - Fax: +27 15 516 4823 Email: info@fieldandstream.co.az

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). Lion not removed from wild. Captive bred from registered breeding,keeping,hunting facility

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:	
Business Name:	Field and Stream
Address:	PO Box 1256 - 3 Industria Road
City:	Louis Trichardt
State/Province:	South Africa 0920
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

See Attached

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, local community, or government?

See Attached

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: Kari Friesen Date: 11/05/2018

    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 governments 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 shipments 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).

- Question 9 - African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

- 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

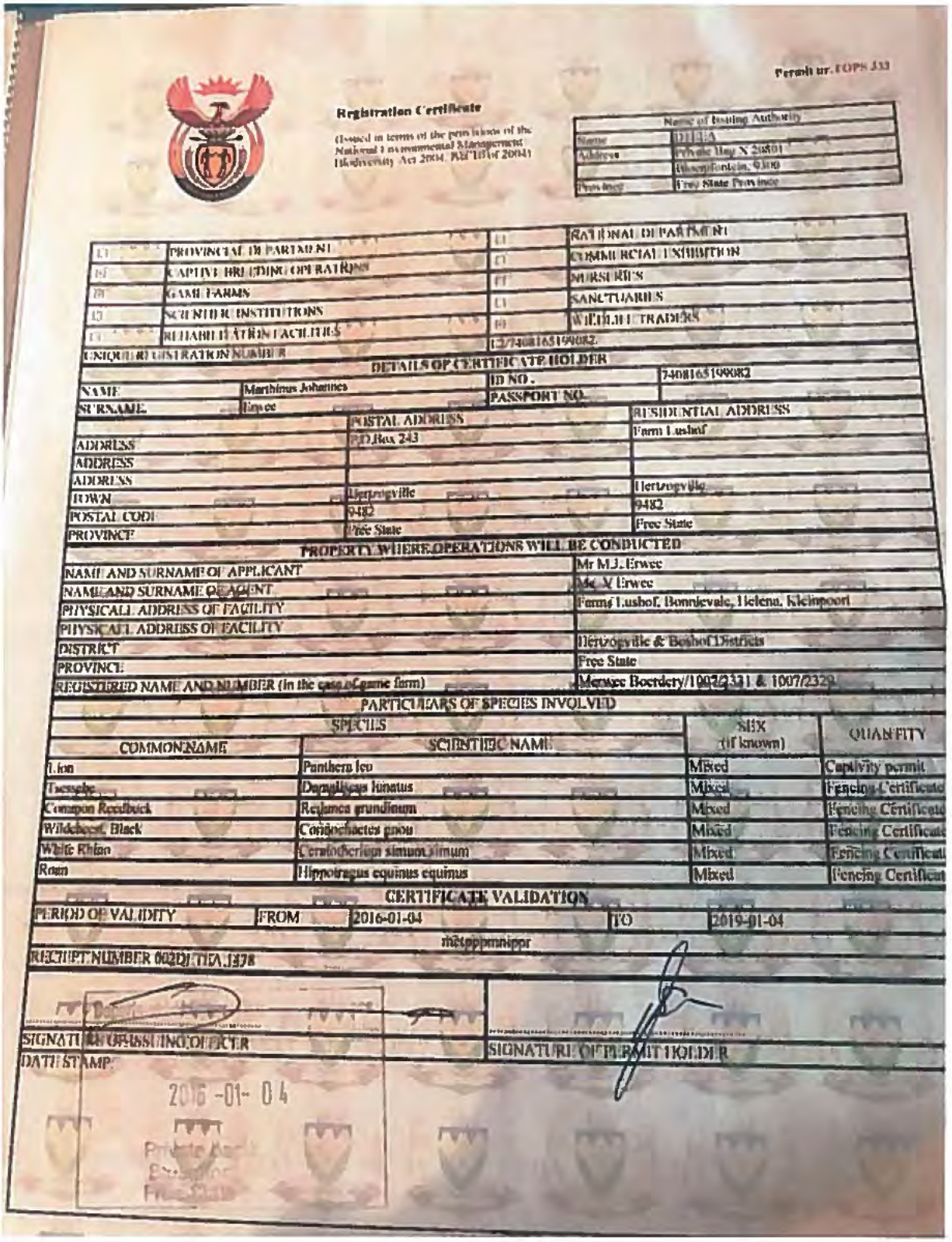
- 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits.

- In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities. I cannot speculate on how the government appropriates the income they receive from permits and licenses.

- In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

- 9c) The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organization that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

FREE STATE REGISTRATION OF FACILITY



Permit nr. FOPS 333

Registration Certificate

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

Name of Issuing Authority	
Name	DTEEA
Address	Private Bag X 20601
	Bloemfontein, 9300
Province	Free State Province

[ ]	PROVINCIAL DEPARTMENT	[ ]	NATIONAL DEPARTMENT
[X]	CAPTIVE BREEDING OPERATIONS	[ ]	COMMERCIAL EXHIBITION
[X]	GAME FARMS	[ ]	NURSERIES
[ ]	SCIENTIFIC INSTITUTIONS	[ ]	SANCTUARIES
[ ]	REHABILITATION FACILITIES	[ ]	WILDLIFE TRADERS

UNIQUE REGISTRATION NUMBER: 12/7408165199082

DETAILS OF CERTIFICATE HOLDER

NAME	Marthinus Johannes	ID NO.	7408165199082
SURNAME	Erwee	PASSPORT NO.	

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	PO Box 243	Farm Lushof
ADDRESS		
ADDRESS		
TOWN	Hertzogville	Hertzogville
POSTAL CODE	9482	9482
PROVINCE	Free State	Free State

PROPERTY WHERE OPERATIONS WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT	Mr M.J. Erwee
NAME AND SURNAME OF AGENT	Mr. M Erwee
PHYSICAL ADDRESS OF FACILITY	Farm Lushof, Bonnievale, Helena, Kleinpoort
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Hertzogville & Boshof Districts
PROVINCE	Free State
REGISTERED NAME AND NUMBER (In the case of game farm)	Merwee Boerdery/1007/2331 & 1007/2329

PARTICULARS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Lion	Panthera leo	Mixed	Captivity permit
Tsessebe	Damaliscus lunatus	Mixed	Fencing Certificate
Common Reedbuck	Redunca arundinum	Mixed	Fencing Certificate
Wildebeest, Black	Connochaetes gnou	Mixed	Fencing Certificate
White Rhino	Ceratotherium simum simum	Mixed	Fencing Certificate
Ram	Hippotragus equinus equinus	Mixed	Fencing Certificate

CERTIFICATE VALIDATION

PERIOD OF VALIDITY: FROM 2016-01-04 TO 2019-01-04

RECEIPT NUMBER 002DTEA1378

SIGNATURE OF ISSUING OFFICER

DATE STAMP: 2016 -01- 04

SIGNATURE OF PERMIT HOLDER

FREE STATE KEEPING FACILITY PERMIT

OFFICIAL PERMIT

98 ZASTRON STREET
AGRICULTURAL BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	7408165199082
NAME	M.J. Erwee
PHYSICAL ADDRESS	Lushof Farm Hertzogville
POSTAL ADDRESS	Box 243 Hertzogville 9462
MOBILE NUMBER:	082-337 4896
FAX NUMBER	N/A
EMAIL ADDRESS	merweebdy@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species-Scientific Name	Identification	Total
Lions (See attached lists)	Panthera leo	125

The permit holder is authorised to possess the specified animals above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AR... ENVIRONMENTAL AFFAIR...	
EXPIRY DATE 31 March 2019 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER NC. 5525/2018	DATE ISSUED 2018 / 03 / 11

Department of Economic & Small Business Development Tourism & Environmental Affairs
2018 -03- 19
Private bag X 20801
Bloemfontein 9300
Free State Province

FREE STATE TRANSPORT PERMIT 1

OFFICIAL PERMIT

[illegible] EASTBURN STREET
AGRICULTURAL BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of
economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	740816 5199 082
NAME	M J Erwee
PHYSICAL ADDRESS	Lushof Hertzogville 9482
POSTAL ADDRESS	Box 243 Hertzogville 9482 Free State
MOBILE NUMBER	082 337 4906
FAX NUMBER	N/A
EMAIL ADDRESS	[illegible]

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT [illegible] PROTECTED SPECIES REGULATIONS AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE [illegible] AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 12409	Panthera leo, Microchip : 981001 0005 50047	1
Lion 12409	Panthera leo, Microchip : 981001 00005 50253	1
Lion 12409	Panthera leo, Microchip : 981001 0005 50240	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions at the back

DESTINATION
740816 5199 082
M J Erwee
Rustdale Game Reserve
[illegible], Taung, North West
082 337 4906

CONSIGNER
740816 5199 082
M J Erwee
Lushof
Hertzogville
082 337 4906

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

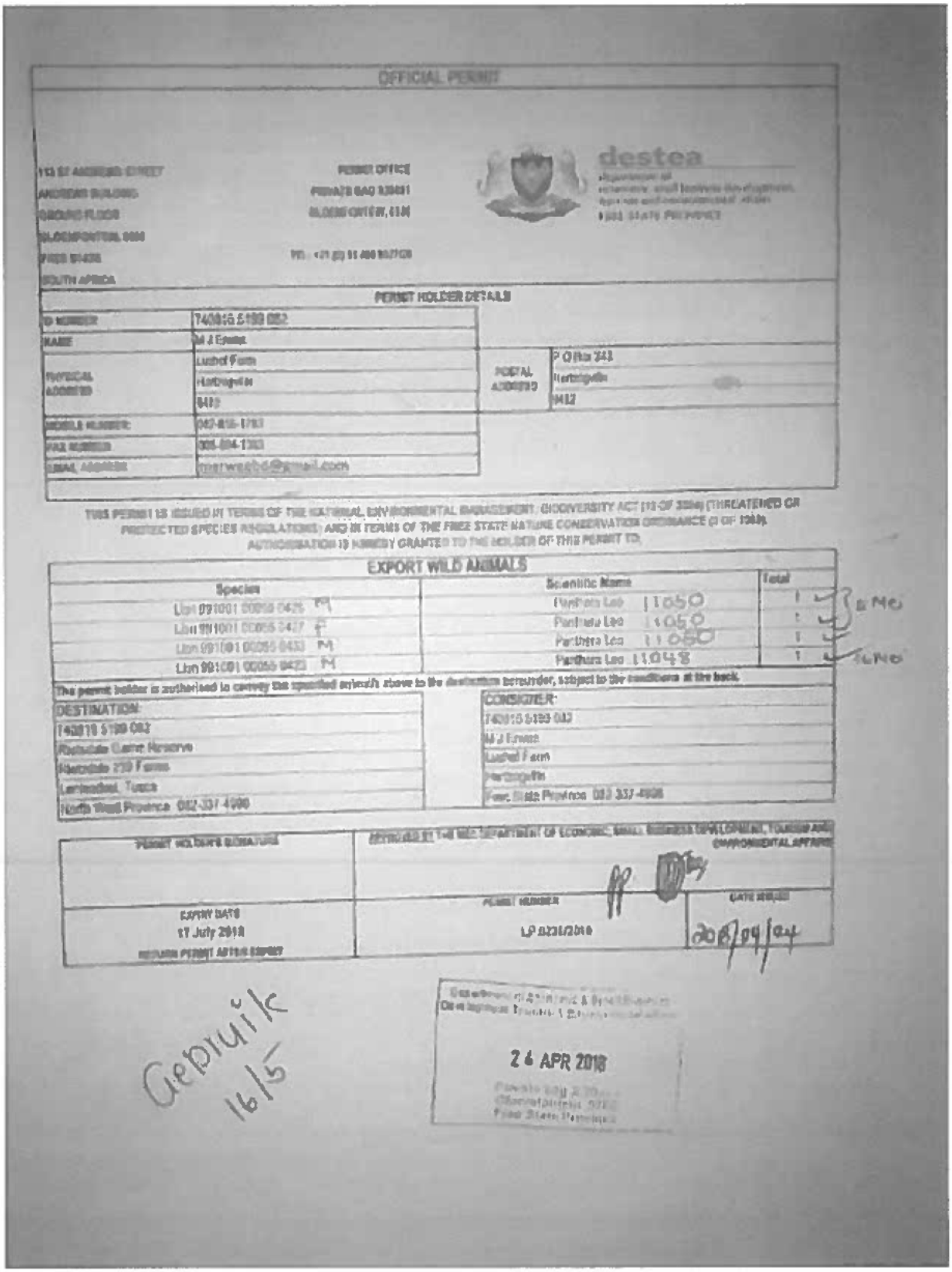
EXPIRY DATE
30 April 2018
RETURN PERMIT AFTER EXPIRY

PERMIT NUMBER
[illegible]/2018

DATE ISSUED
25-2-2018

Department of Economic & Small Business Development, Tourism & Environmental Affairs
20 FEB 2018
Private Bag X20801
Bloemfontein 9300
Free State Province

FREE STATE TRANSPORT PERMIT 2



OFFICIAL PERMIT

destea

PERMIT OFFICE

PERMIT HOLDER DETAILS

ID NUMBER	740815 5193 082
NAME	M J Ernst
PHYSICAL ADDRESS	Lushof Farm Hertzogville 9422
POSTAL ADDRESS	P O Box 243 Hertzogville 9422
MOBILE NUMBER	082-855-1783
FAX NUMBER	086-694-1393
EMAIL ADDRESS	mjernst65@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT [10 OF 2004] (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE [8 OF 1969].
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 991001 00055 0425 M	Panthera Leo [1050	1
Lion 991001 00055 0427 F	Panthera Leo [1050	1
Lion 991001 00055 0433 M	Panthera Leo [1050	1
Lion 991001 00055 0423 M	Panthera Leo [1048	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions at the back.

DESTINATION:	CONSIGNER:
740815 5193 082	740815 5193 082
Rietvlei Game Reserve	M J Ernst
Rietvlei 219 Farms	Lushof Farm
Lanseria, Tuscs	Hertzogville
North West Province 082 337 4908	Free State Province 082 337 4908

PERMIT HOLDER'S SIGNATURE	ISSUED BY THE DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS	
EXPIRY DATE 17 July 2018 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP 0236/2018	DATE ISSUED 2018/04/24

Gedruk 16/5

24 APR 2018

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: Q 11050

NAME OF ISSUING AUTHORITY	
NAME	DAIR OFFICES
ADDRESS	MOLOPO & NCORD STR
ADDRESS	VRYBURG
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	MJ Fiwee	ID NO.	7408165199 082
SURNAME	Fiwee	PASSPORT NO.	
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS	P.O. Box 243	Lushof farm	
ADDRESS			
ADDRESS			
TOWN	Hertzogville	Hertzogville	
POSTAL CODE	9482	9482	
PROVINCE	Free State	Free State	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MJ Fiwee
NAME AND SURNAME : RESPONSIBLE PERSON	MJ Fiwee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Lushof Farm
PHYSICAL ADDRESS OF FACILITY	Hertzogville
DISTRICT	
PROVINCE	Free State
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	02	0236/2018
Lion	Panthera leo	Female	01	0286/2018

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of two (2) captive bred male lion and two (2) female captive bred lion from MJ Fiwee, Lushof farm, Hertzogville to MJ Fiwee, farm Reitsdale, Leeuwdoorn, Taung

NAME AND SURNAME OF PURCHASER / SELLER	MJ Fiwee
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	Reitsdale farm 239, Leeuwdoorn, Taung

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	N/A
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	N/A
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 18/04/2018	TO: 17/06/2018
RECEIPT NUMBER R50-00-683		

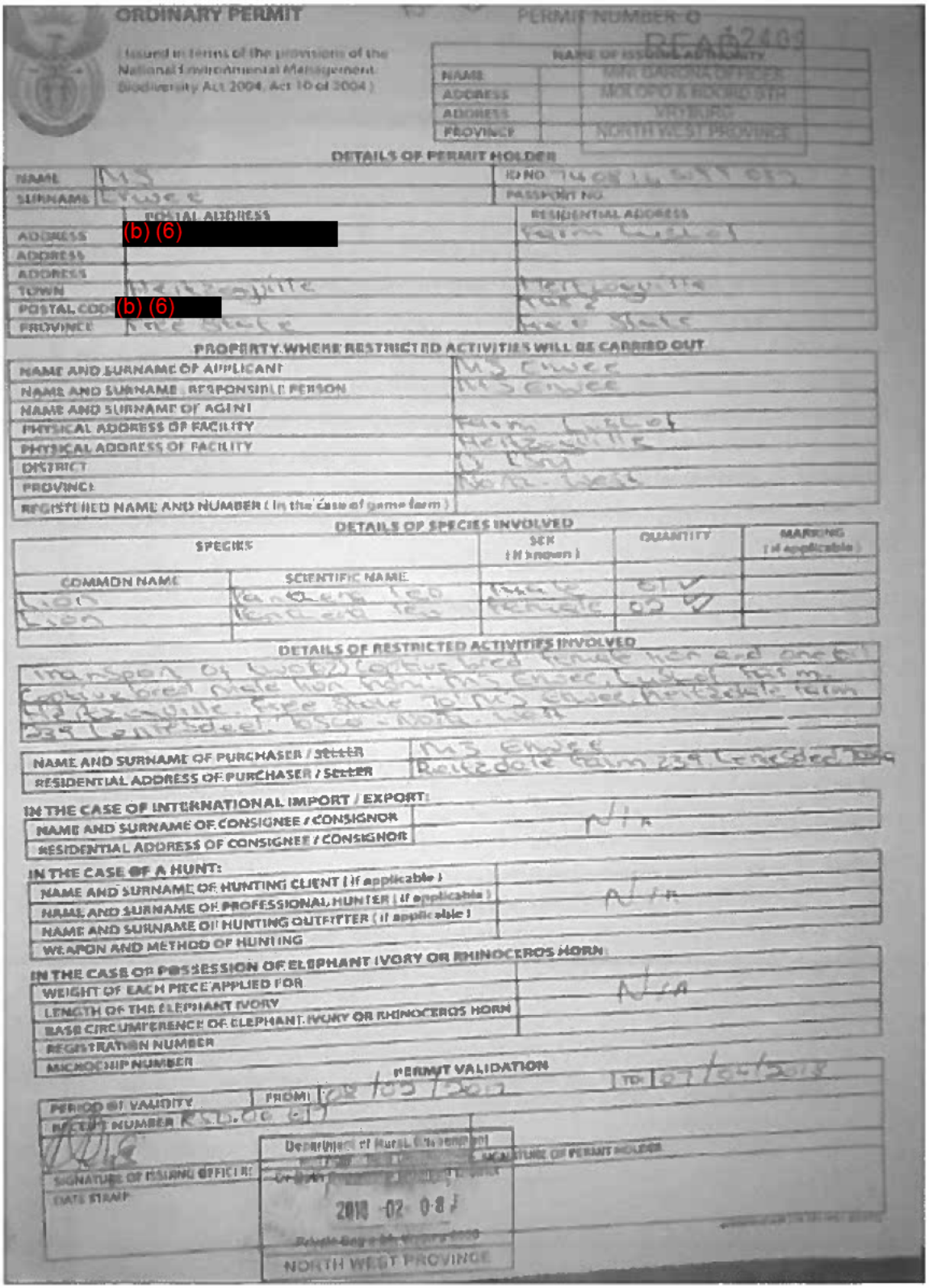
SIGNATURE OF ISSUING OFFICER:

SIGNATURE OF PERMIT HOLDER:

DATE STAMP:

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2018 -04- 18
NORTH WEST PROVINCE

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT



ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER 0

NAME OF ISSUING AUTHORITY

NAME: MMC BARRICK OFFICES
ADDRESS: MOLOPO & ROOD STR
ADDRESS: VRYBURG
PROVINCE: NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	MS	ID NO	
SURNAME	Ehwee	PASSPORT NO	
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	(b) (6)		Farm Lydel
ADDRESS			
ADDRESS			
TOWN	Hartbeespoort		Hartbeespoort
POSTAL COD	(b) (6)		Rust
PROVINCE	North West		North West

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MS Ehwee
NAME AND SURNAME / RESPONSIBLE PERSON	MS Ehwee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Lydel
PHYSICAL ADDRESS OF FACILITY	Hartbeespoort
DISTRICT	Brits
PROVINCE	North West
REGISTERED NAME AND NUMBER (In the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	
Lion	Panthera leo	Female	02	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of Lion (2) Panthera leo female her and one (1) Panthera leo male lion from MS Ehwee, Lydel farm, Hartbeespoort, North West to MS Ehwee, Hartbeespoort farm 239 Lenasdrift, Rosco - North West

NAME AND SURNAME OF PURCHASER / SELLER	MS Ehwee
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	Hartbeespoort farm 239 Lenasdrift Rosco

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	N/A
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN

WEIGHT OF EACH PIECE APPLIED FOR	N/A
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY FROM: 02/02/2018 TO: 07/08/2018

RECEIPT NUMBER R 5,00 01

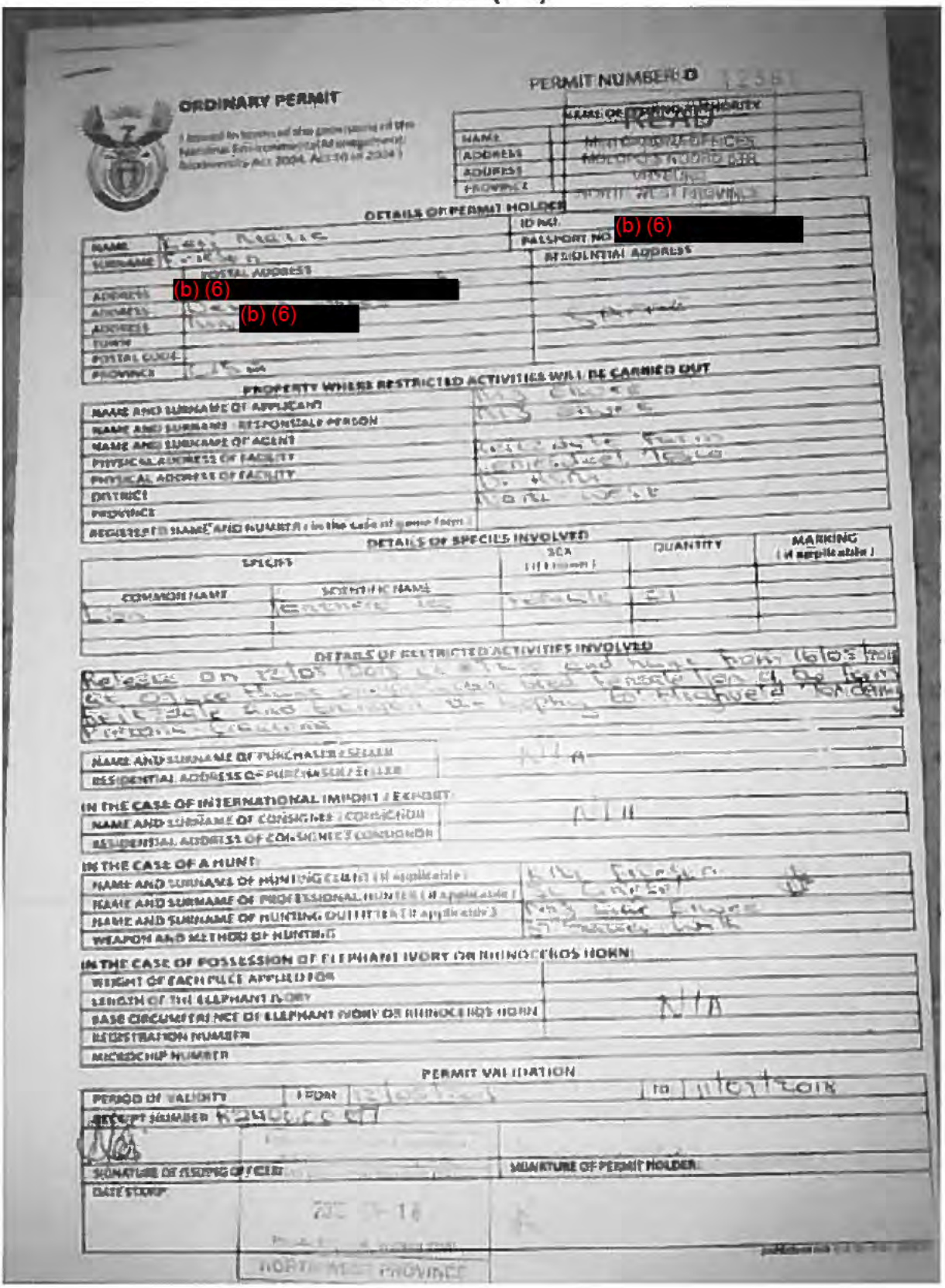
SIGNATURE OF ISSUING OFFICIAL:

DATE STAMP:

Department of Rural Development
2018 -02- 08
NORTH WEST PROVINCE

SIGNATURE OF PERMIT HOLDER

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - FEMALE (P 1)



ORDINARY PERMIT

PERMIT NUMBER: 1256

NAME OF ISSUING AUTHORITY: READ

NAME: MINI CIPALITY OFFICE

ADDRESS: MOLOPO ROAD CBR

ADDRESS: VRYBURG

PROVINCE: NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME:

SURNAME:

ADDRESS: POSTAL ADDRESS (b) (6)

ADDRESS: (b) (6)

ADDRESS:

TOWN:

POSTAL CODE:

PROVINCE:

ID NO.:

PASSPORT NO: (b) (6)

RESIDENTIAL ADDRESS

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT

NAME AND SURNAME: RESPONSIBLE PERSON

NAME AND SURNAME OF AGENT

PHYSICAL ADDRESS OF FACILITY

PHYSICAL ADDRESS OF FACILITY

DISTRICT

PROVINCE

REGISTERED NAME AND NUMBER: (in the case of game farm)

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

NAME AND SURNAME OF PURCHASER / SELLER

RESIDENTIAL ADDRESS OF PURCHASER / SELLER

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR

RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR

IN THE CASE OF A HUNT

NAME AND SURNAME OF HUNTING CLIENT (if applicable)

NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)

NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)

WEAPON AND METHOD OF HUNTING

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN

WEIGHT OF EACH PIECE APPLIED FOR

LENGTH OF THE ELEPHANT IVORY

BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN: N/A

REGISTRATION NUMBER

MICROCHIP NUMBER

PERMIT VALIDATION

PERIOD OF VALIDITY: FROM [illegible] TO [illegible]

RECEIPT NUMBER: [illegible]

SIGNATURE OF ISSUING OFFICER

SIGNATURE OF PERMIT HOLDER

DATE STAMP

NORTH WEST PROVINCE

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - FEMALE (P 2)

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted :- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity. Tell: 053 928 0656 or \071 889 7867\082 446 1816
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

Signature of Issuing Officer: _____ Date: 18/04/2018

Signature of hunter: _____ Date: 17/05/18

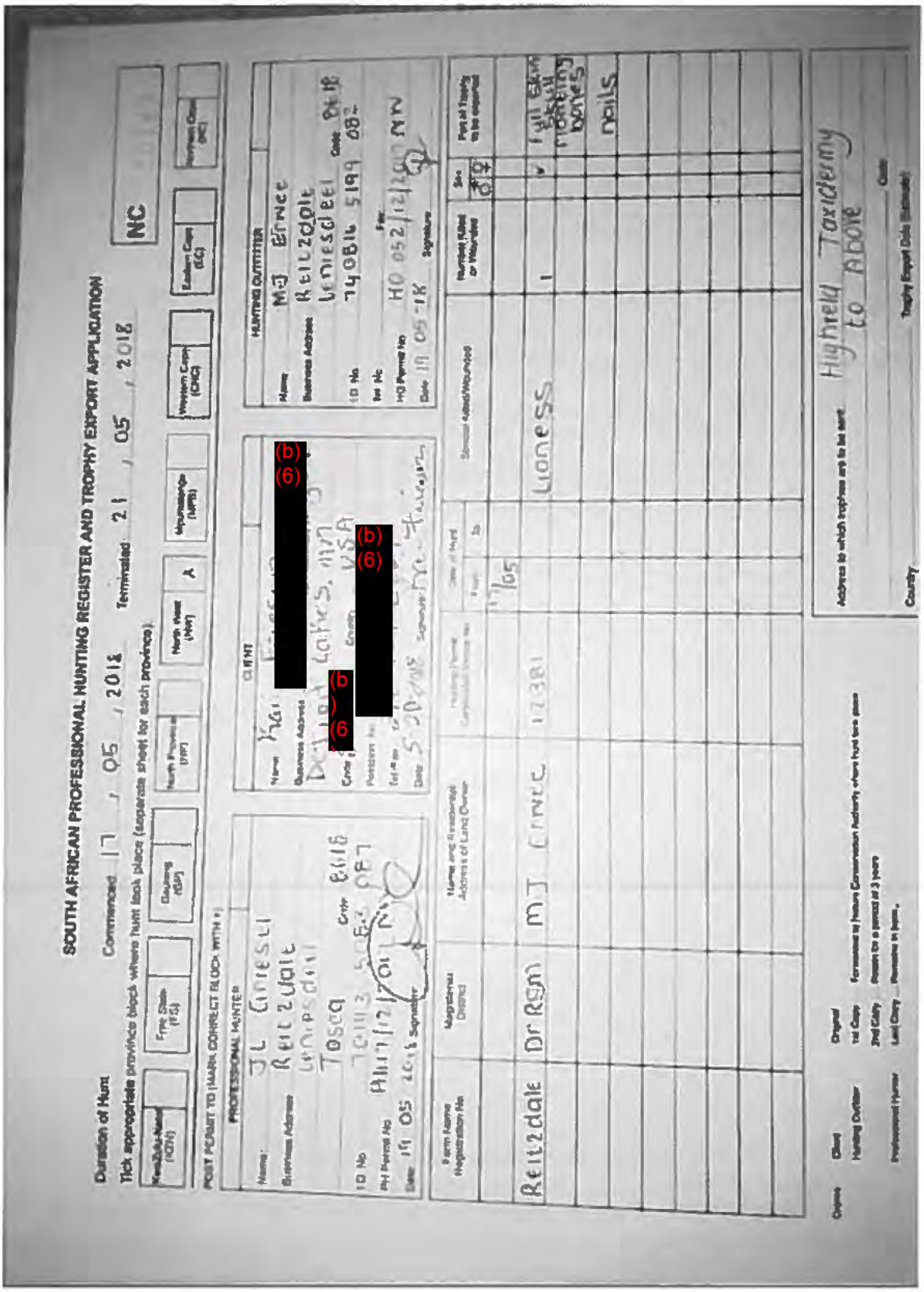
Signature of land owner: _____ Date: 17/05/18

Signature of PH: _____ Date: 17/05/18

2018 -04- 18

NORTH WEST PROVINCE

SA HUNTING REGISTER - FEMALE
K FRIESEN



SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt — Commenced 17 / 05 / 2018 — Terminated 21 / 05 / 2018 — NC

Tick appropriate province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN) | Free State (FS) | Gauteng (GP) | North Province (NP) | North West (NW) X | Mpumalanga (MPB) | Western Cape (CNC) | Eastern Cape (EC) | Northern Cape (NC)

POST PERMIT TO (MARK CORRECT BLOCK WITH X)

PROFESSIONAL HUNTER
Name: JL Griesel
Business Address: Reitzdale, Leniesdeel, Tosca — Code 8618
ID No 70113 [illegible] 087
PH Permit No AH17/12/2017 NW
Date 19 05 2018 Signature

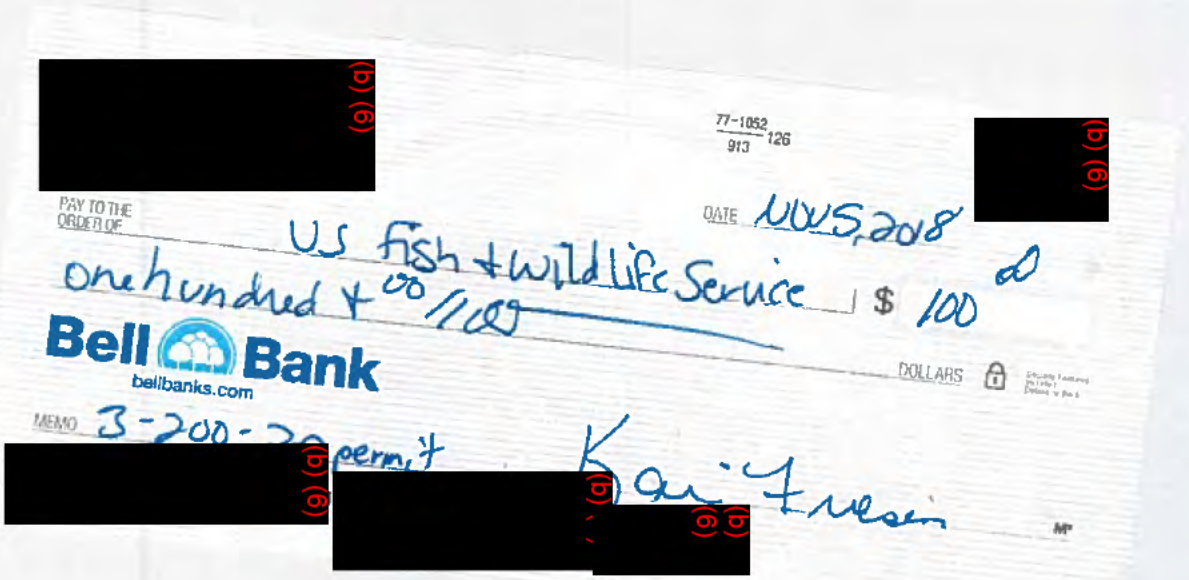
CLIENT
Name Kai [redacted]
Business Address [redacted]
Detroit Lakes, MN
Code [redacted] Country USA
Passport No [redacted]
Tel No
Date 5-20-2018 Signature

HUNTING OUTFITTER
Name MJ Ernce
Business Address Reitzdale, Leniesdeel — Code 8618
ID No 740816 5199 082
Tel No — Fax
HO Permit No HO 052/12/2017 NW
Date 19 05 18 Signature

Farm Name Registration No	Magisterial District	Name and Residential Address of Land Owner	Hunting Farm Certificate / Licence No	Date of Hunt From	To	Species Killed/Wounded	Number Killed or Wounded	Sex ♂	♀	Part of Trophy to be exported
				19/05						
Reitzdale	Dr RSM	MJ Ernce	12381			Lioness	1		✓	Full skin, skull, mounting bones, nails

Copies: Client — Original; Hunting Outfitter — 1st Copy: Forwarded to Nature Conservation Authority where hunt took place; 2nd Copy: Retain for a period of 3 years; Professional Hunter — Last Copy: Remains in book.

Address to which trophies are to be sent: Highveld Taxidermy to Above
Code
Country — Trophy Export Date (Estimate)


[redacted] (b) (6)

77-1052
913 126

[redacted] (b) (6)

PAY TO THE ORDER OF U.S. fish + wildlife Service DATE NOV 5, 2018

$ 100 00

one hundred + 00/100 DOLLARS

Bell Bank
bellbanks.com

MEMO 3-200-20 permit

[redacted] (b) (6)

[redacted] (b) (6)

[redacted] (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Friesen	Brett	A.	Mr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Detroit Lakes	MN	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100. 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.

Brett Friesen

Digitally signed by Brett Friesen
DN: cn=Brett Friesen, o, ou, email=bfriesen@friesensinc.com, c=US
Date: 2018.11.05 13:33:40 -06'00'

Signature of applicant/Principal Officer 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: 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 a trophy 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 4-6 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)?

   Brett Friesen (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Adult 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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

South Africa - Latitude -26.149147 Longitude 24.081302 - Reitzdale Concession - Tosco, South Africa (Nearest City)

   b. Date wildlife was hunted:

05/19/2018

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

JP Big Game Safaries Pty Ltd - Juan Pace - Postnetsuite 291, Private bag x 37, Lynwoodridge, 0040

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 foreign export/re-export document]:

FIELD AND STREAM TAXIDERMY P.O Box 1256 - 3 Industria Road - Louis Trichardt - 0920
South Africa Tel: +27 15 516 1081 - Fax: +27 15 516 4823 Email: info@fieldandstream.co.za

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). Lion not removed from wild. Captive bred from registered breeding,keeping,hunting facility.

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:	
Business Name:	Field and Stream
Address:	PO Box 1256 - 3 Industria Road
City:	Louis Trichardt
State/Province:	South Africa 0920
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

See Attached

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, local community, or government?

See Attached

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

See Attached

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: Brett Friesen Digitally signed by Brett Friesen DN: cn=Brett Friesen, o, ou, email=bfriesen@friesensinc.com, c=US Date: 2018.11.05 13:34:04 -06'00' Date: _____

    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 governments 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 shipments 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).

- Question 9 - African lion as a species is currently listed under the Endangered Species Act. The breeding of lions in captive environments in South Africa and the release of these animals for hunting purposes into registered hunting areas are all Government controlled legal activities. Strict legislation and regulations are in place in South Africa in order to monitor that lions bred in captive environments and released for hunting purposes adhere to legal requirements.

- 9a) The Biodiversity Management plan for African Lion (Panthera leo) in South Africa (Dec,2015) indicates that the population of lions in captive environments in South Africa is about 8000 animals. The population growth of lions in captive environments is actively and adaptively managed.

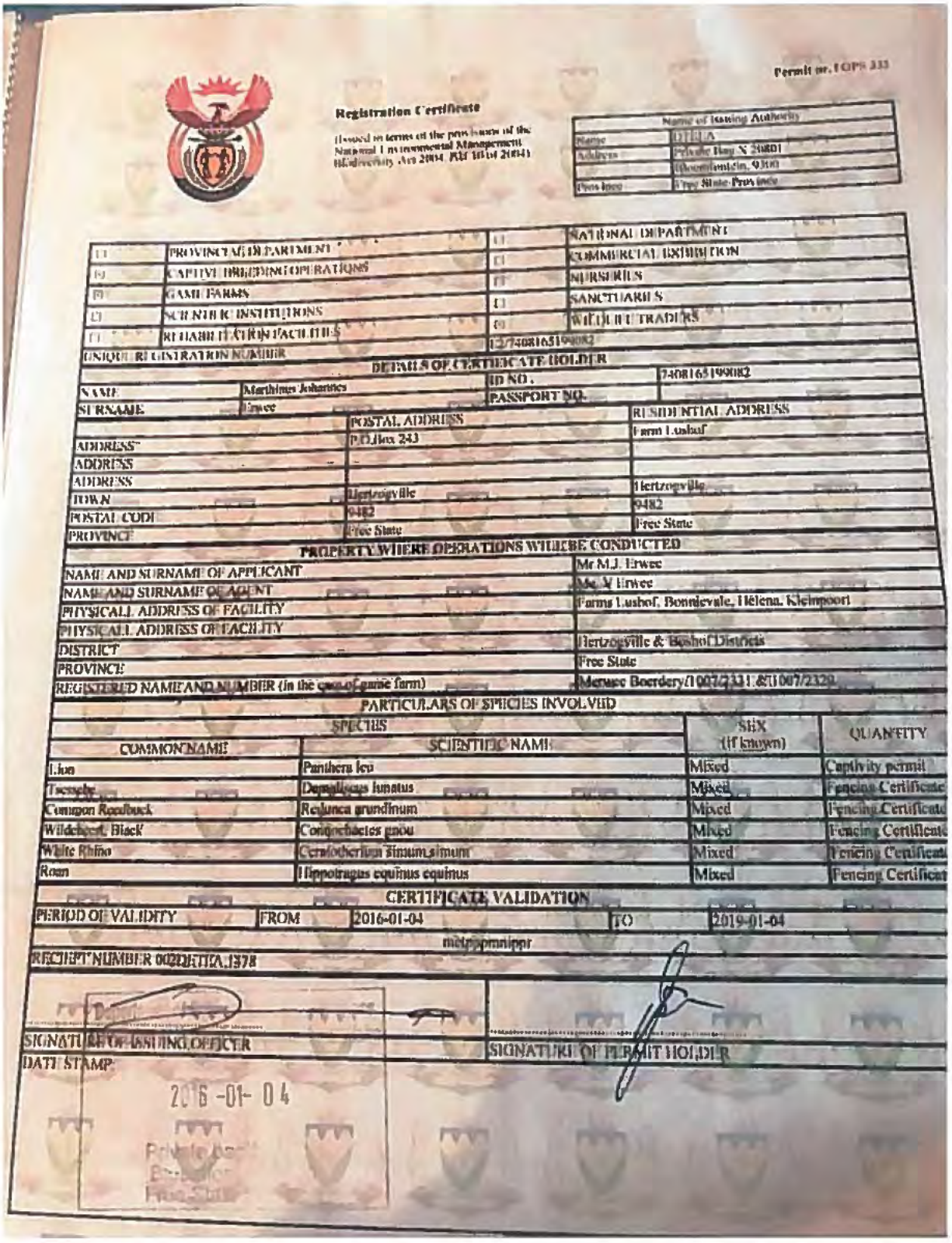
- 9b) The hunting of any lions, albeit captive or wild, in South Africa is a restricted activity under various National and Provincial Legislation. License and permit fees are paid to the various government departments for Standing permits, Keeping permits, breeding permits, transport permits, release permits, hunting permits, game farm registration licenses, professional hunter license, hunting outfitters license, Taxidermy permits, Export of Trophy permits and CITES permits.

- In addition, employment is provided to many members of rural communities that would otherwise not have these employment opportunities. I cannot speculate on how the government appropriates the income they receive from permits and licenses.

- In order for a captive bred lion hunt to be authorized in South Africa, the landowner needs to comply with a list of criteria. One of the criteria is to obtain an Ecological Management plan for the specific area where the animals are to be released for hunting purposes. Prey base numbers and species variation are part of the aspects that are addressed in these Management Plans. These Management plans are part of the permit conditions for lion release areas and these are monitored by the various Government authorities.

- 9c) The landowner in this specific case conserves, manages and maintains an area of about 3600 hectares (about 8900 acres) of prime lion habitat, as well as prey species. This landowner is a member of the South African Predator Association (SAPA), a member based organization that represents the captive lion keeping, breeding and hunting industry. A Conservation fund was established by SAPA, with the object of contributing to the conservation of lions in the wild through direct funding of various lion conservation projects. This specific landowner contributes to the SAPA Conservation Fund on a regular basis, both financially and with data pertaining to his lions and lion enterprise.

FREE STATE REGISTRATION OF FACILITY



Permit nr. FOPS 333

Registration Certificate

Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004 (Act 10 of 2004)

Name of Issuing Authority	
Name	DTEEA
Address	Private Bag X 20601
	Bloemfontein, 9300
Province	Free State Province

[ ]	PROVINCIAL DEPARTMENT	[ ]	NATIONAL DEPARTMENT
[x]	CAPTIVE BREEDING OPERATIONS	[ ]	COMMERCIAL DISTRIBUTION
[ ]	GAME FARMS	[ ]	NURSERIES
[ ]	SCIENTIFIC INSTITUTIONS	[ ]	SANCTUARIES
[ ]	REHABILITATION FACILITIES	[x]	WILDLIFE TRADERS

UNIQUE REGISTRATION NUMBER: [illegible]7408165199082

DETAILS OF CERTIFICATE HOLDER

NAME	Marthinus Johannes	ID NO.	7408165199082
SURNAME	Erwee	PASSPORT NO.	

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	P.O.Box 243	Farm Lusbof
ADDRESS		
ADDRESS		
TOWN	Hertzogville	Hertzogville
POSTAL CODE	9482	9482
PROVINCE	Free State	Free State

PROPERTY WHERE OPERATIONS WILL BE CONDUCTED

NAME AND SURNAME OF APPLICANT	Mr M.J. Erwee
NAME AND SURNAME OF AGENT	Mr. V Erwee
PHYSICALL ADDRESS OF FACILITY	Farms Lusbof, Bondievale, Helena, Kleinpoort
PHYSICALL ADDRESS OF FACILITY	
DISTRICT	Hertzogville & Boshof Districts
PROVINCE	Free State
REGISTERED NAME AND NUMBER (in the case of game farm)	Merwee Boerdery/1007/2331 &/1007/2329

PARTICULARS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY
COMMON NAME	SCIENTIFIC NAME		
Lion	Panthera leo	Mixed	Captivity permit
Tsessebe	Damaliscus lunatus	Mixed	Fencing Certificate
Common Reedbuck	Redunca arundinum	Mixed	Fencing Certificate
Wildebeest, Black	Connochaetes gnou	Mixed	Fencing Certificate
White Rhino	Ceratotherium simum simum	Mixed	Fencing Certificate
Roan	Hippotragus equinus equinus	Mixed	Fencing Certificate

CERTIFICATE VALIDATION

PERIOD OF VALIDITY	FROM	2016-01-04	TO	2019-01-04

melpopminper

RECEIPT NUMBER 0020ETTA.1378

SIGNATURE OF ISSUING OFFICER

SIGNATURE OF PERMIT HOLDER

DATE STAMP

2016 -01- 04

Private Bag X20601
Bloemfontein
Free State

FREE STATE KEEPING FACILITY PERMIT

OFFICIAL PERMIT

88 ZASTRON STREET
AGRICULTURAL BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of economic, small business development, tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	7408165199082
NAME	M.J. Erwee
PHYSICAL ADDRESS	Lushof Farm Herzogville
POSTAL ADDRESS	Box 243 Herzogville 9462
MOBILE NUMBER:	082-337 4996
FAX NUMBER	N/A
EMAIL ADDRESS	merweeboy@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species-Scientific Name	Identification	Total
Lions	Panthera leo	125
(See attached lists)		

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

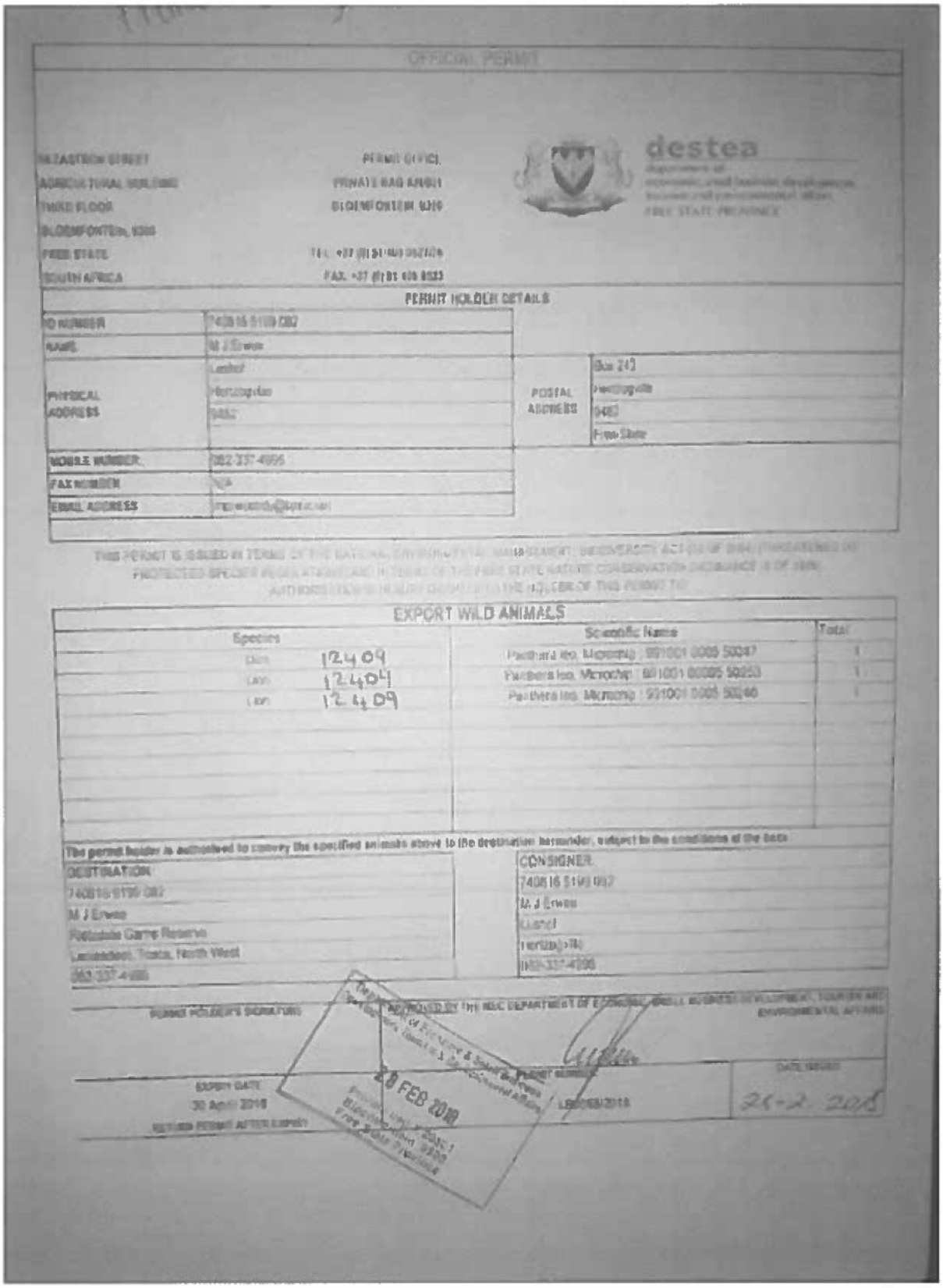
EXPIRY DATE
31 March 2019
RETURN PERMIT AFTER EXPIRY

PERMIT NUMBER
NC. 5525/2018

DATE ISSUED
2018 03 11

Department of Economic & Small Business Development Tourism & Environmental Affairs
2018 -03- 19
Private bag X 20801
Bloemfontein 9300
Free State Province

FREE STATE TRANSPORT PERMIT 1



OFFICIAL PERMIT

destea

PERMIT HOLDER DETAILS

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 12409	Panthera leo Microchip: 991001 0005 50047	1
Lion 12404	Panthera leo Microchip: 991001 0005 50253	1
Lion 12409	Panthera leo Microchip: 991001 0005 50246	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions of the back

DESTINATION

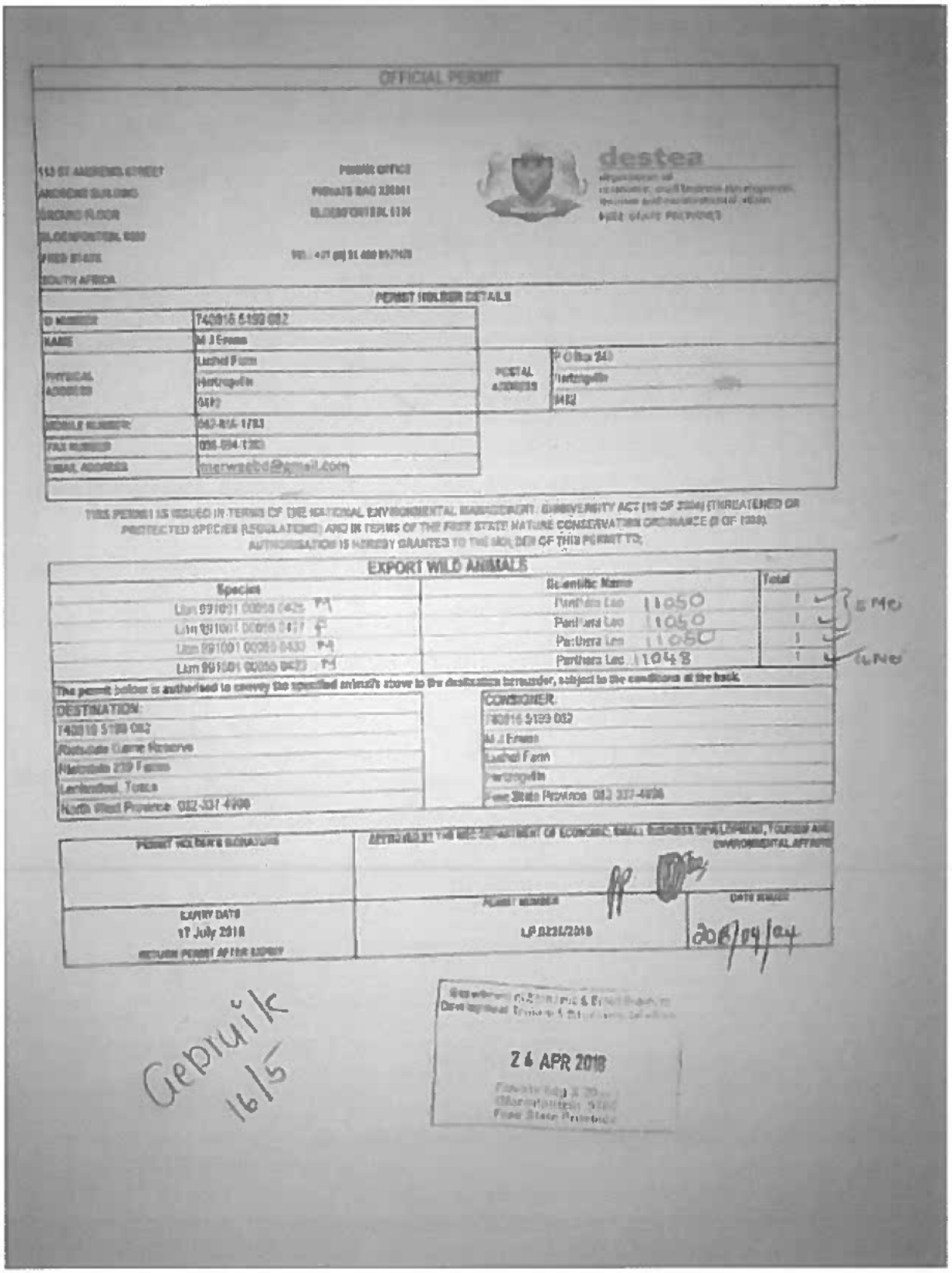
CONSIGNER

28 FEB 2018

EXPIRY DATE
30 April 2018

DATE ISSUED
26-2-2018

FREE STATE TRANSPORT PERMIT 2



OFFICIAL PERMIT

destea

PERMIT HOLDER DETAILS

ID NUMBER	740916 5199 082
NAME	M J Erasmus
PHYSICAL ADDRESS	Lushof Farm Hertzogville 9422
POSTAL ADDRESS	P O Box 24 Hertzogville 9422
MOBILE NUMBER	082-855-1783
FAX NUMBER	086 694 1383
EMAIL ADDRESS	marnusbbd@gmail.com

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969). AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

EXPORT WILD ANIMALS

Species	Scientific Name	Total
Lion 991001 00058 0425 M	Panthera Leo 11050	1
Lion 991001 00058 0417 F	Panthera Leo 11050	1
Lion 991001 00058 0433 M	Panthera Leo 11050	1
Lion 991001 00058 0423 M	Panthera Leo 11048	1

The permit holder is authorised to convey the specified animals above to the destination hereunder, subject to the conditions at the back.

DESTINATION:	CONSIGNER:
740916 5199 082	740916 5199 082
Pilanesberg Game Reserve	M J Erasmus
Nietvoorbij 239 Farms	Lushof Farm
Lanseria, Tosca	Hertzogville
North West Province 082-337-4936	Free State Province 082 337 4936

PERMIT HOLDER'S SIGNATURE	APPROVED BY THE HEAD: DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS
EXPIRY DATE 17 July 2018 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP 023/2018
	DATE ISSUED 2018/04/24

Gebruik 16/5

26 APR 2018

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

1x female used

PERMIT NUMBER: Q 11050

	NAME OF ISSUING AUTHORITY
NAME	MMABATHO OFFICES
ADDRESS	MOLOPO & NOORD STR
ADDRESS	VRYBURG
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	MJ Fouche	ID NO.	740816519 082
SURNAME	Fouche	PASSPORT NO.	
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS	P O Box 243	Lushof Farm	
ADDRESS			
ADDRESS			
TOWN	Hertzogville	Hertzogville	
POSTAL CODE	9482	9482	
PROVINCE	Free State	Free State	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MJ Fouche
NAME AND SURNAME : RESPONSIBLE PERSON	MJ Fouche
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Lushof Farm
PHYSICAL ADDRESS OF FACILITY	Hertzogville
DISTRICT	
PROVINCE	Free State
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	0256 2018
Lion	Panthera leo	Female	01	0286 2018

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of two (02) captive bred male lion and two (02) female captive bred lion from MJ Fouche, Lushof Farm, Hertzogville FS, to MJ Fouche, Farm Reitsdale, Lemoenfontein, Tosca.

NAME AND SURNAME OF PURCHASER / ~~SELLER~~	MJ Fouche
RESIDENTIAL ADDRESS OF PURCHASER / ~~SELLER~~	Reitsdale farm 259, Lemoenfontein, Tosca

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	Nil
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	N/A
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	Nil
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 19/04/2018	TO: 17/06/2018
RECEIPT NUMBER	R50-00-[illegible]	

SIGNATURE OF ISSUING OFFICER: Dr Ruth Segomotsi Mompati District

SIGNATURE OF PERMIT HOLDER

DATE STAMP:

Department of Rural, Environment and Agricultural Development

2018 -04- 18

NORTH WEST PROVINCE

NORTH WEST PROVINCE IMPORT & TRANSPORT PERMIT

ORDINARY PERMIT

PERMIT NUMBER: O REA02409

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

NAME OF ISSUING AUTHORITY	
NAME	MINI GARONA OFFICES
ADDRESS	MOLOPO & ROORD STR
ADDRESS	VRYBURG
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	MS	ID NO	7408 [illegible]
SURNAME	Ewee	PASSPORT NO	

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS	PO Box 343	Farm [illegible]
ADDRESS		
ADDRESS		
TOWN	Hertzogville	Hertzogville
POSTAL CODE	[illegible]	[illegible]
PROVINCE	Free State	Free State

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MS Ewee
NAME AND SURNAME : RESPONSIBLE PERSON	MS Ewee
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm [illegible]
PHYSICAL ADDRESS OF FACILITY	Hertzogville
DISTRICT	[illegible]
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	male	01 ✓	
Lion	Panthera leo	female	05 ✓	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Transport of two (2) captive bred female lion and one (1) captive bred male lion from MS Ewee, [illegible] farm, Hertzogville, Free State to MS Ewee, Reitzdale farm 239 [illegible], North West

NAME AND SURNAME OF PURCHASER / SELLER	MS Ewee
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	Reitzdale farm 239 [illegible]

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	N/A
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	N/A
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 08/05/2017	TO	07/05/2018
RECEIPT NUMBER	R50.00 [illegible]		

SIGNATURE OF ISSUING OFFICER

DATE STAMP

Department of Rural, Environment and Agricultural Development [illegible]
2018 -02- 08
Private Bag X [illegible] Vryburg 8600
NORTH WEST PROVINCE

SIGNATURE OF PERMIT HOLDER

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - MALE (P 1)

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: 0 12384

READ

	NAME OF ISSUING AUTHORITY
NAME	
ADDRESS	
ADDRESS	
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME		ID NO	
SURNAME		PASSPORT NO	(b) (6)
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	(b) (6)		
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	
NAME AND SURNAME: RESPONSIBLE PERSON	
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

NAME AND SURNAME OF PURCHASER / SELLER	
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM		TO
RECEIPT NUMBER			
SIGNATURE OF ISSUING OFFICER:		SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	2015 -04- 15		

NORTH WEST PROVINCE RELEASE & HUNTING PERMIT - MALE (P 2)

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / Immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity. **Tell: 053 928 0656 or \071 889 7867\082 446 1816**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 14, 31 and 49 of the TOPS Regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

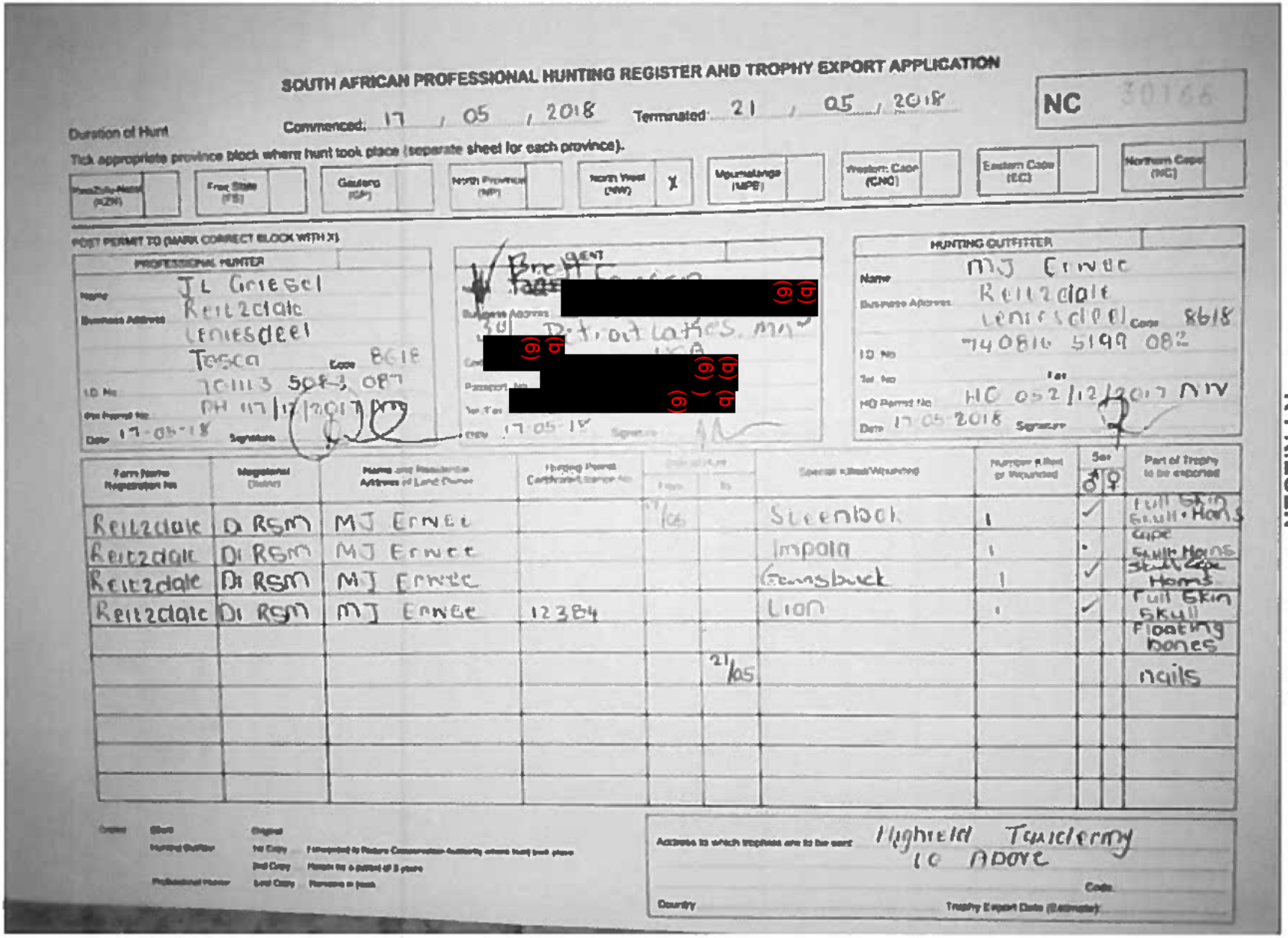
Signature of Issuing Officer: _____ Date: 18/04/2018

Signature of hunter: _____ Date: 11 05 2018

Signature of land owner: _____ Date: 11 05 2018

Signature of PH: _____ Date: 11 05 2018

2018 -04- 18



SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

NC 30166

Duration of Hunt Commenced: 17 / 05 / 2018 Terminated: 21 / 05 / 2018

Tick appropriate province block where hunt took place (separate sheet for each province).

KwaZulu-Natal (KZN) | Free State (FS) | Gauteng (GP) | North Province (NP) | North West (NW) X | Mpumalanga (MPE) | Western Cape (CNC) | Eastern Cape (EC) | Northern Cape (NC)

POST PERMIT TO (MARK CORRECT BLOCK WITH X)

PROFESSIONAL HUNTER
Name: JL Griesel
Business Address: Reitzdale, Griesdeel, Tosca, Code 8618
ID No: 7011 3508 5 087
Gun Permit No: PH 117/12/2017 NW
Date: 17-05-18 Signature:

AGENT
Name: [redacted]
Business Address: [redacted] Detroit Lakes, MN
Passport No: [redacted]
Tel No: [redacted]
Date: 17-05-18 Signature:

HUNTING OUTFITTER
Name: MJ Ernee
Business Address: Reitzdale, Griesdeel, Code 8618
ID No: 740816 5199 08?
Tel No: Fax
HO Permit No: HO 052/12/2017 NW
Date: 17-05-2018 Signature:

Farm Name Registration No	Magisterial District	Name and Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date of Hunt From	Date of Hunt To	Species Killed/Wounded	Number Killed or Wounded	Sex ♂	Sex ♀	Part of Trophy to be exported
Reitzdale	DRSM	MJ Ernee		17/05		Steenbok	1	✓		Full Skin Skull + Horns
Reitzdale	DRSM	MJ Ernee				Impala	1	✓		Cape Skull Horns
Reitzdale	DRSM	MJ Ernee				Gemsbuck	1	✓		Skull Cap Horns
Reitzdale	DRSM	MJ Ernee	12384			Lion	1	✓		Full Skin Skull Floating bones
				21/05						nails

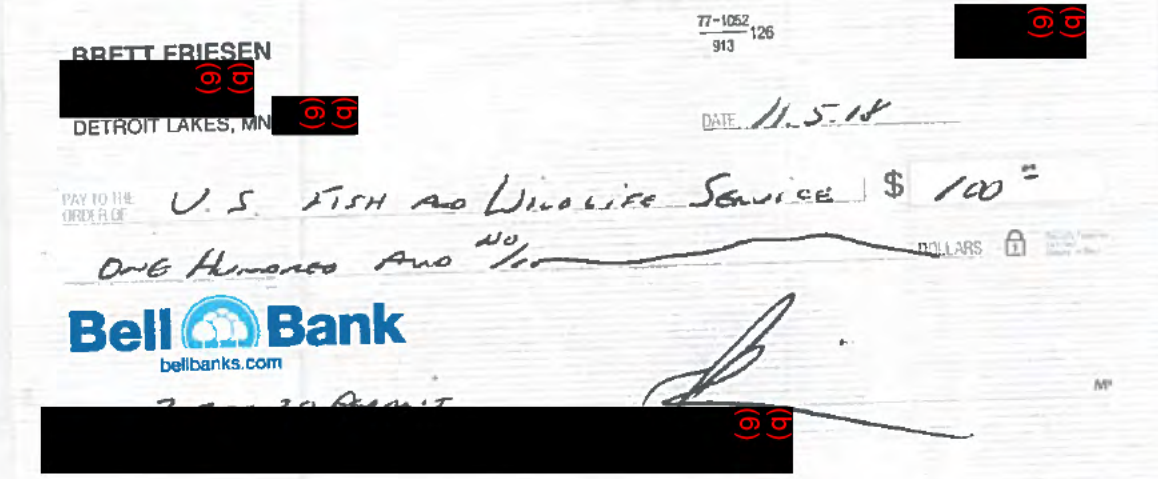
Copies: Client — Original; Hunting Outfitter — 1st Copy; 2nd Copy; Professional Hunter — Local Copy

Address to which trophies are to be sent: Highveld Taxidermy, 10 Adore

Country: Code:

Trophy Export Date (Estimate):

SA HUNTING REGISTER - MALE
K FRIESEN



BRETT FRIESEN
[redacted]
DETROIT LAKES, MN [redacted]

77-1052
913
126

[redacted]

DATE 11.5.18

PAY TO THE ORDER OF U.S. FISH AND WILDLIFE SERVICE $ 100 =

ONE HUNDRED AND NO/100 DOLLARS

Bell Bank
bellbanks.com

[redacted]

We want to give our clients a good hunting experience in a very large game reserve.

Feel free to ask more questions.

Sincerely
Hans de Klerk
DE KLERK SAFARIS
www.dksafaris.com

I will try and answer the questions under section 9 to the best of my ability.

Question 9 b.) We paid R2 300 to the government for the lion hunting license. At the time and exchange rate it translates to about $200.
I do not know what the government is doing with the money. It must be a substantial amount because in 2015 before USA stopped the importation of lion trophies there were over 2000 lion hunting licenses issued just in that year in Northwest province alone. You will get more information as to what the government is doing with the money from SAPA (South African Predator Association). I know that SAPA does have a conservation fund that we all contribute to (R10 000 per lion hunted) and that PHASA wanted to donate the money to the government's conservation fund with the one provision that the money will only be used for lion research and conservation. The South African government did not want to (or could not) give us (SAPA) the guarantee so we did not transfer the money to the government. So we are sitting with more than R2 million in a conservation fund. The SAPA conservation fund has already successfully completed numerous lion conservation projects. They will be better suited to give you more information regarding that.
Regarding the trophy fee on lions - I am not sure what Mr Rogers paid for his lion trophy fee as he paid Bobby Hansen who was the middleman PH who brought Mr Arky Rogers to us.
I would assume Mr Rogers paid somewhere between $12 000 and $18 000 for his lion trophy fee. A big portion of that money is spent on running my own lion breeding project. I have 3 different lion breeding projects at three different locations. The reason for that is in case a disease break out at one place the other two will hopefully be not affected. In total I have about 130 lions. The upkeep of the breeding facilities, electrification of fences, feeding cost of the lions, veterinary expenses and salaries is very expensive.
Most of the trophy fees (80 %) of each lion is ploughed back into taking care of the lions. In the past I owned no lions but since I got involved with lion hunting in 2004 I started breeding with them and can say now that if it was not for hunting these 130 lions that I own would not have existed. The lion breeders all over South Africa own now more than 8 000 lions in captivity. If something must happen to the wild lion population like cat flu or TB and wipe out most of the wild lions the breeders will have a healthy reserve to restock the game reserves. So it is vital to keep these captive lions around not just to replenish the lion populations but also to provide a very wide spectrum of genetics in case there is inbreeding in some of the smaller game reserves. Also

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
ROGERS	EVERETT	W.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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

Section 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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAKE CITY	FLORIDA	(b) (6)		USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
SAME AS ABOVE

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)

11-7-18

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 PGE. 1

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

   Hans De Klerk — +27-82-828-4899
   dksafaris@gmail.com

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.

4. 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

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

   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:
   N/A

   b. Date wildlife is to be hunted:
   N/A

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

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:
   WILZENAU RANCH, TITLE DEED NO. T/812/2004
   BRAY, DR. RUTH SEGOMOTSI, MOMPATI DISTRICT
   MUNICIPALITY, NORTH WEST PROVENCE, SOUTH AFRICA

   b. Date wildlife was hunted:
   16/03/2018 to 21/03/2018

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

BOBBY HANSEN SAFARIS

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]:

BULLSEYE TAXIDERMY, OPEN SEASON FARM
CORNER MELKRIVIER & STERKSTROOM ROAD
VAALWATER, 0530 SOUTH AFRICA

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). SEE ATTACHED

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: BRETT PIDDUCK
Business Name: AFRICAN LEGACY LOGISTICS
Address: 40 KOKKEWIET STREET RANDPARK RIDGE
City: JOHANNESBURG
State/Province: 2169
Country, Postal Code: SOUTH AFRICA

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?
SEE ATTACHED

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?
SEE ATTACHED

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
SEE ATTACHED

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.

N/A 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: Edward W. Taylor Date: 11-7-18

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).

WE WILL BE USING COPPERSMITH GLOBAL LOGISTICS IN ATLANTA, GA (ph. no. 404-366-1650)

114 Southfield Parkway
Suite 170
Forest Park, GA 30297
(Contact person: Tammy Lewis)

* Question 7, (on permit Import Application

read
Department
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Nkoppa & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8601

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27 (86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 12410
(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the transport of the **Trophy or parts** of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling**, **possession**, **exporting**, **importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A.V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2018 -02- 08
Private Bag x 34 Vryburg 8600
NORTH WEST PROVINCE

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

№ 26928

Duration of Hunt Commenced 16 / 03 / 2018 Terminated 01 / 03 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Northern Province (NP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CWC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name JC de Klerk
Business Address PO Box 53
Brits
Code 0250
ID No 6410095009082
PH Permit No PH 0524/10/2017 NW
Date 21/03/2018 Signature JdeKlerk

CLIENT

Name Everett [redacted]
Permanent Postal Address [redacted]
[redacted] Lake City
Code [redacted] Country USA
Passport No [redacted]
Tel/Fax
Date 21/3/2018 Signature [redacted]

HUNTING OUTFITTER

Name JC de Klerk
Business Address PO Box 53
Brits
Code 0250
ID No 6410095009082
Tel No 0128387402 Fax No
PH Permit No PH 0519/10/2017 NW
Date 21/03/2018 Signature JdeKlerk

Farm Name / Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit, Certificate/Licence No	Date Killed / Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex M	Sex F	Conservation Fee	Parts of Trophy to be Exported
Dikhololo-[illegible]	D.PSN	JC de Klerk Uitzenau	012410	2/3	Lion	1		✓		Skull, Tail, Skin

Copies: Client — Original White; 1st Copy Pink — Forward to Nature conservation authority where hunt took place; Hunting Outfitter — 2nd Copy Blue — Retain for a period of three years; Taxidermist — 3rd Copy Green — Taxidermist; Professional Hunter — Last Copy Yellow — Remains in book

NB: A voluntary charge of $10 or €10 is levied for every trophy taken

Address to which trophies are to be sent

Code

Country Trophy Export Date (Estimate)

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: O 12410

NAME OF ISSUING AUTHORITY	READ
NAME	
ADDRESS	MINI GARONA OFFICES
ADDRESS	MOLOPO & NOORD STR
PROVINCE	VRYBURG
	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	Everett W	ID NO.	
SURNAME	Rogers	PASSPORT NO.	[redacted]
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS	Circle R Ranch		
ADDRESS	[redacted]		
ADDRESS		SAME	
TOWN	Lake City		
POSTAL CODE	[redacted]		
PROVINCE	USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	JC de Clerk
NAME AND SURNAME : RESPONSIBLE PERSON	JC de Clerk
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Ranch Witzenau
PHYSICAL ADDRESS OF FACILITY	Bray
DISTRICT	Dr RSM
PROVINCE	North West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	
				[initials]

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 13/02/2018 at 08h00 and hunt 13/02/2018 at 08h00. Hunt one (1) captive bred male lion and transport the trophy to Taxidermist South Africa, Steelsum Road Volksrust.

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	E W Rogers
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	JC de Clerk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	JC de Clerk
WEAPON AND METHOD OF HUNTING	Rifle 375 .. Walk & Stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	N/A
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: ~~04/02/2018~~ 13/02/18	TO:	~~07/03/2018~~ 30/03/18
RECEIPT NUMBER R2300.00 EFT			
[signature]		[signature]	
SIGNATURE OF ISSUING OFFICER		SIGNATURE OF PERMIT HOLDER	
DATE STAMP:	Department of Rural, Environment and Agricultural Development, Dr Ruth Segomotsi Mompati District, 2018 -02- 08, Private Bag x 34, Vryburg 8600, NORTH WEST PROVINCE		

STANDARD PERMIT CONDITIONS

1. This permit is not transferable.
2. Any unauthorised alternation to this permit shall render it invalid.
3. This permit is subject to the provisions of any applicable law in force during the period of validity of the permit.
4. This permit is valid only within the province where it was issued
5. The holder of this permit shall, at the request of a person authorised in terms of applicable legislation so to demand forthwith produce such permit to such person.
6. This permit shall be invalid until such time that it is signed by the permit holder.
7. This permit shall be deemed invalid when it is lost or destroyed and no copy thereof shall be issued.
8. This permit may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any wild animal or the safety of any person, provided that the permit holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal.
9. The prescribed fees paid for the issuing of this permit shall not be refunded.
10. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence
11. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

SPECIAL CONDITIONS

1. The issuing authority shall determine the species and restricted activities for which this permit will apply.
2. If this permit applies to hunting, the holder of this permit must:
   a. Have a copy of this permit authorising the hunt, on his or her person during the hunt;
   b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating:
   (i) the permit number and date of issuance if the permit,
   (ii) the species, sex and number of animals hunted; and
   (iii) the location where the hunt took place.
   c. Return the original permit to the issuing authority forthwith after expiry of the permit.
   d. To be completed by landowner after completion of the hunt:

Name and signature of landowner: J.C. de Klerk

Species, number and sex of animal hunted: 1 x Male

Date / Period of hunt: 20 March 2018

read
Department
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr Moore & Nobel
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213

Ordinary Permit No: O 12410

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises **the hunting** of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)
No hunting with dogs is allowed.

Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. **A Nature Conservation Official must be present during the release of the lion.** **Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity.** **Tell: 053 928 0656 or \071 889 7867\082 446 1816**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.
This permit is subjected to the approved Management plan of the facility. **The permit holder of this permit is binded by the contents of the approved Management Plan of this facility.** **Any contravention to the contents of the approved Management Plan of this facility will be an offence.** **The permit holders and the owner of this facility must report the escape, injury or death (to animals and to any human being) to the Vryburg Conservation office, as well as the local SAPS office within 24 hours of the incident**

Signature of Issuing Officer: _____ Date: 08/02/2018

Signature of hunter: _____ Date: 20/3/2018

Signature of land owner: _____ Date: 20 / March 2018

Signature of PH: _____ Date: 20 March 2018

Department of Rural Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2018 -02- 08 :
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

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Panthera leo – Lion

Regional Red List status (2016)	**Least Concern***
National Red List status (2004)	Vulnerable D1
Reasons for change	Genuine change: increased population
Global Red List status (2016)	Vulnerable A2abcd
TOPS listing (NEMBA) (2007)	Vulnerable
CITES listing (1977)	Appendix II
Endemic	No

*Conservation Dependent

Although Lions formerly occurred widely over sub-Saharan Africa, today there are only 10 Lion strongholds remaining, of which six occur in southern Africa (Riggio et al. 2013).

Taxonomy

Panthera leo (Linnaeus 1758)

ANIMALIA - CHORDATA - MAMMALIA - CARNIVORA - FELIDAE - *Panthera - leo*

Synonyms: *Felis leo* (Linnaeus 1758)

Common names: Lion, African Lion (English), Leeu (Afrikaans), Isilwane (Ndebele), Tau (Sepedi, Sesotho, Setswana), Ndau (Tshivenda), isiGidi, iNgwenyama (Xhosa), iNgonyama (Xhosa, Zulu), Nghala (Xitsonga), iBhubesi (Zulu)

Taxonomic status: Species

Taxonomic notes: The latest published phylogeographical study of Lions shows that the traditional split between Asian and African Lions as distinct subspecies is untenable (Barnett et al. 2014). Based on these results, the Cat Classification Task Force of the IUCN SSC Cat Specialist Group has provisionally proposed a different split into two subspecies, *P. l. leo* of Asia and West, Central and North Africa; and *P. l. melanochaita* from South and East Africa, with several regional management units identified as well (Haas et al. 2005; Bertola et al. 2011, 2015; Bauer et al. 2015).

Assessment Rationale

The Lion populations in South Africa declined substantially in the 19th century but have been stable or increasing over the past 20–30 years. The number of free-roaming mature Lions in South African large protected areas has increased from an estimated 800 in 2002–2004 to an estimated 1,286 in 2015. Furthermore, by including the entire area of transfrontier parks as interconnected and functional landscapes (over which South African conservation authorities have shared management jurisdiction), the total number of mature, free-roaming Lions within the assessment region is estimated to be 1,550. The number of small reserves containing Lions has increased from one in 1990 to at least 45 in 2013, which corresponds to an increase in Lion numbers from about 10 in 1990 to 500 (225 mature individuals) in 2013. Including Lions on small reserves yields a total mature population size of 1,775 individuals. Thus, Lion numbers in the assessment region comfortably exceed the threshold for D1 and the species does not qualify as threatened using the A or C criteria because the two major free roaming subpopulations have not declined over the past 20 years (3 generations). In Kruger National Park (KNP) alone, the number of Lionesses is estimated to have increased by 45% between 2005 and 2015. Thus we list the species as Least Concern.

This species would technically qualify for Near Threatened D1 if we exclude the managed subpopulations in small reserves and assess only the South African portions of the transfrontier parks (1,286 mature individuals). However, because the overall population is stable or increasing with no severe threats that could cause rapid decline, and because the reintroduced subpopulations on small reserves qualify as wild and free roaming, a Least Concern listing is most appropriate. Similarly, the regional criterion could be applied as the two major Lion subpopulations are connected to conservation areas in Botswana, Zimbabwe and Mozambique through transfrontier conservation areas. Thus, there has been a genuine increase in Lion numbers due to the success of

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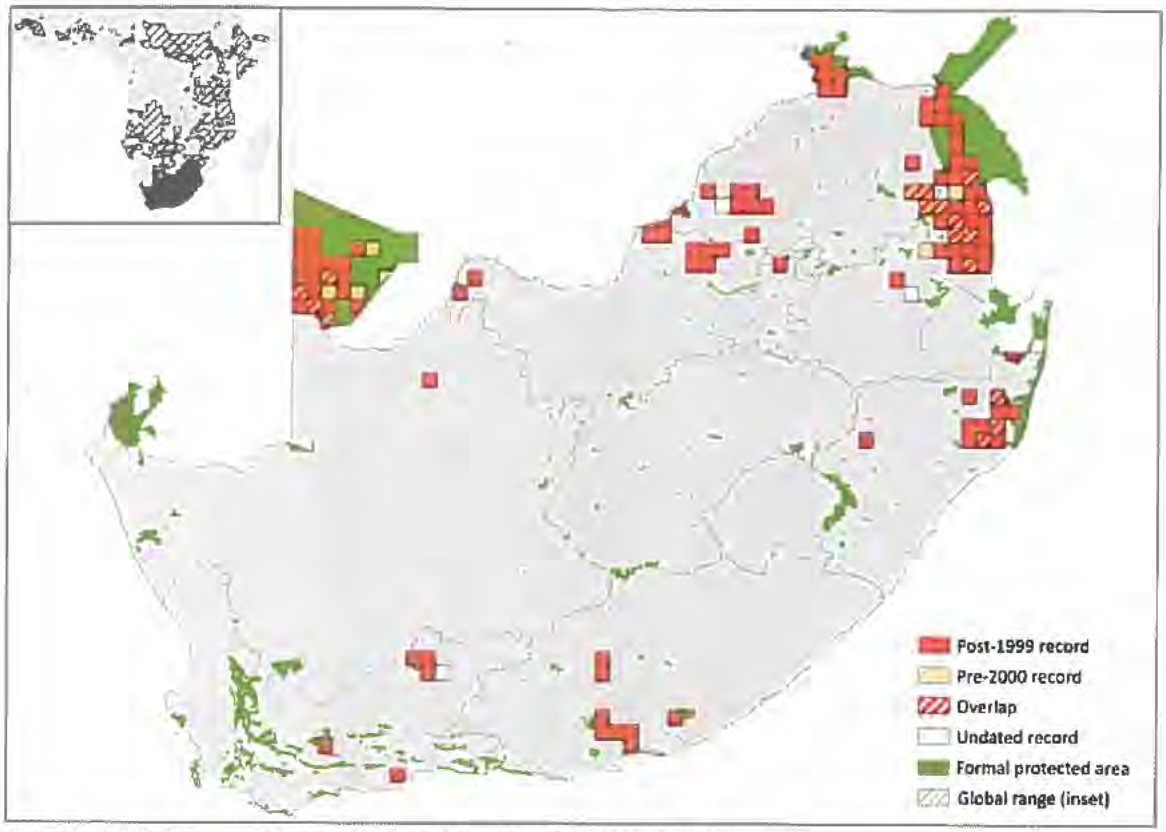

Figure 1. Distribution records for Lion (*Panthera leo*) within the assessment region

Table 1. Countries of occurrence within southern Africa

Country	Presence	Origin
Botswana	Extant	Native
Lesotho	Regionally extinct	Native
Mozambique	Extant	Native
Namibia	Extant	Native
South Africa	Extant	Native and reintroduced
Swaziland	Extant	Reintroduced
Zimbabwe	Extant	Native

transfrontier conservation areas and private protected area expansion.

There are no major current threats to Lions in the assessment region. While the trade in Lion bones to East-Southeast Asia has been cited as a potential threat in South Africa, evidence suggests that the trade is not adversely impacting on wild Lion subpopulations in South Africa because the skeletons are almost all a by-product of the sizeable trophy hunting industry, and Lions that are hunted in South Africa are almost exclusively captive-bred (which are excluded from this assessment). However, this situation needs to be closely monitored (especially elsewhere in Africa where the scale of the bone trade is largely unknown) and the assessment re-evaluated if new data become available that indicates that the bone trade is a threat to wild Lions. Currently, key interventions include the formulation and adoption of a metapopulation plan (small, fenced subpopulations require greater management input and coordination) and protected area expansion (especially transfrontier conservation areas).

Regional population effects: Although the range is mostly fragmented within the assessment region, there is connectivity and dispersal between subpopulations within Kgalagadi Transfrontier Park and Great Limpopo Transfrontier Park. There is also dispersal across the Botswana and South African border at the Greater Mapungubwe Transfrontier Park. Thus, there is potential for immigration.

Distribution

Lions originally roamed freely across most of South Africa but hunting and changes in land use (particularly farming) devastated Lions between the late 1800s and early 1900s and restricted them to large national parks by the middle of the 20th century (Nowell & Jackson 1996). For example, Lion became regionally extinct in the Eastern Cape by 1879 (Skead 2007). The fate of Lions in the Northern Cape is typical of many parts of the country: based on the average pride size of 11 individuals recorded in the dune-savannah of Kgalagadi Transfrontier Park (KTP) (Funston 2011), at least 1,492 Lions may have resided in the Northern Cape before the species was hunted to near local extinction in the 1800s. Lion disappeared from regions such as Namaqualand, Bushmanland, Karoo, Tankwa-Karoo, the Kimberley region and north of the Orange River. At one point, Lions survived only in the national park that now forms part of the KTP (*viz* Kalahari Gemsbok National Park), where they have been protected since 1931. Since the 1990s, however, Lion prides have been established on three

private properties in the Kalahari region of the Northern Cape (north of the Orange River). Lions have also been reintroduced into Swaziland: Swaziland's last resident Lion was reputedly seen by King Sobhuza II in the late 1950s at Hunter's Rock in Hlane National Park (Monadjem 1998). Subsequently, a male and two females were introduced from KNP to Hlane National Park in 1994 (Monadjem 1998).

Generally, the expansion of private game reserves, especially since the early 1990s, has reclaimed lost ranges for Lions and they currently occur in isolated subpopulations in all provinces of South Africa, except for the Free State (Hayward et al. 2007; Hunter et al. 2007; Slotow & Hunter 2009; Miller et al. 2013; Williams et al. 2015a). However, these subpopulations are highly fragmented, with over 45 "small" (< 1,000 km²) reserves having reintroduced Lion (Miller et al. 2013). There is currently a push to develop a metapopulation management plan to reduce the effects of fragmentation (Miller et al. 2013). Although the subpopulations on private reserves occur in fenced areas, some of which are smaller than the average range that would be required under natural conditions (but see Hayward et al. 2009), these subpopulations are all considered free-roaming and have access to large and varied prey populations (for example, Power 2002, 2003; Slotow & Hunter 2009).

This species still occupies only a small part of its former range in South Africa and they now persist on *c.* 40,000 km² as compared to 1.22 million km² historically. Lions are almost exclusively found in fenced areas in South Africa (there is only a very small free-roaming subpopulation in northern Limpopo bordering Botswana and Zimbabwe – this probably accounts for fewer than 20 animals). The current area of occupancy (41,745 km²) has been determined by summing the areas of the fenced reserves where Lions occur. The largest proportion comprises a few large transnational or provincial protected areas (33,200 km², *c.* 80%), with the remainder made up of 45 small fenced private or state reserves with a combined area of *c.* 8,500 km². The transnational protected areas are all fenced on the South Africa side, but open to neighbouring countries which have varying levels of fencing. Some reserves may have dropped internal fences since the last data were collected and so have increased their individual size and there may be one or two new reserves that have not been included, but this number should be reasonably representative. The smaller reserves (< 1,000 km²) complement the conservation value of larger reserves and have greatly helped to expand the area of occupancy for Lions. However, the small, fenced populations (many of which support fewer than 20 individuals), require greater management input and coordination than those populations in transfrontier parks (Miller et al. 2013).

Population

Lion numbers have been dropping dramatically across the African continent (Bauer et al. 2015). However, in South Africa, the Lion population is stable or increasing in major reserves and increasing through the addition of small reserves or through the formation of conservancies (Table 2). There are an estimated 3,490 free-roaming Lions in South Africa, including transfrontier zones; and 2,876 in South African conservation areas alone. Of these, there are 1,775 mature Lions, using a 50% mature population structure evident in large reserves (Smuts 1976; Mills et al. 1978); and 1,511 in South African conservation areas alone. If we use the total formally protected mature population of Lions (1,775), it represents 5–9% of the global mature population of 23,000–39,000 Lions (Riggio et al. 2013; Bauer et al. 2015).

The conservation success of the formally protected population is due largely to the transfrontier parks (established in the early 2000s) that have created resilient and self-sustaining Lion subpopulations. The Great Limpopo Transfrontier Park subpopulation (estimated at *c.* 2,000 individuals in 2013; 2,311 individuals if the private conservancies open to KNP on the western boundary are included), which represents 50% of the free-roaming Lion population, has remained stable or has slightly increased over the past 30 years (Ferreira & Funston 2010), where the KNP numbers have reached c. 1,700 individuals. Recent surveys, using 240 call-up stations distributed randomly throughout KNP, indicate the subpopulation has increased over the past decade from 1,684 (95% confidence intervals 1,617–1,751) in 2005 to 1,803 (95% confidence intervals 1,715–1,891) individuals in 2015 and,

Table 2. Current subpopulation numbers of Lion (*Panthera leo*) in South Africa and surrounding transfrontier areas. All counts were made between 2008 and 2013.

Location (sub-location)	Total Lions (South Africa only)	Number mature Lions (South Africa only)	Reference
Great Limpopo Transfrontier Park (Kruger National Park)	2,000 (*c.* 1,700)	1,060 (*c.* 900)	Ferreira & Funston 2010; Smuts 1976
Associated Private Nature Reserves (Greater Kruger National Park)	300	160	Funston 2004; Smuts 1976
Kgalagadi Transfrontier Park Total (South Africa only)	520 (246)	255 (167)	Ferreira et al. 2013; Funston 2011; S. Ferreira unpubl. data
Greater Mapungubwe Transfrontier Conservation Area (South Africa only)	~50 (10)	25 (5)	Funston 2010
Hluhluwe–iMfolozi Park	120	54	D. Druce pers comm. Feb 2014; 45% from small reserve data for mature Lions
Total excluding small reserves	**2,990 (2,376)**	**1,550 (1,286)**	
Small reserves	500	225	Miller et al. 2013
Total including small reserves	**3,490 (2,876)**	**1,775 (1,511)**	

for adult females specifically, from 415 (95% confidence intervals 380–450) to 604 (95% confidence intervals 515–693) (S. Ferreira unpubl. data).

Similarly, the South African side of the KTP has been fairly stable since the first population estimate in 1976 of 140 Lion, ranging between 108 and 181 (Funston 2001, 2011), and KTP overall reached over 500 individuals in 2010 (Ferreira et al. 2013). Recent mark-recapture estimates for the South African side of KTP may indicate an increasing subpopulation, where the total number of individuals is estimated to be 246 (95% confidence intervals 238–256), and the number of mature individuals is estimated to be 167 (95% confidence intervals 160–177) (S. Ferreira unpubl. data). The subpopulation in the Greater Mapungubwe Transfrontier Conservation Area (GMTFCA) contains Lions on the De Beers Venetia Limpopo Nature Reserve, which does require active management as they are enclosed. However, the rest of the Lions in the GMTFCA are completely free-roaming (not contained by fences) and so are not managed, although they are constantly under threat from human-wildlife conflict. The subpopulation in Hluluwe-iMfolozi Park (HiP) has increased from two founders in 1956 and 60 mature individuals in 1966 to a stable population of approximately 120 in 2014 (D. Druce unpubl. data), with new individuals being reintroduced in the late 1990s to mitigate potential inbreeding (Trinkel et al. 2008).

Lions have also been extensively reintroduced onto small reserves (including national, provincial and privately protected areas), having increased from one in 1990 to 45 in 2013, with a corresponding increase in numbers from 10 to *c.* 500 (Miller et al. 2013; Miller & Funston 2014). Around 45% of these Lions are mature (225 individuals), as opposed to 50% of Lions in large national parks or transfrontier parks (1,400 individuals). All small reserve subpopulations are ecologically functional as, for example, they are large enough for social dynamics and hunting to continue unhindered, although some reserves may import prey stocks (Power 2002, 2003; Hayward et al. 2007). Thus, they may occasionally receive supplementary prey but are not fed and are not captive-bred Lions. Such subpopulations continue to grow and generally increase to the extent that management has become a necessity (Power 2003; Hayward et al. 2009; Slotow & Hunter 2009), although the addition of new reserves has slowed in the past five years (Miller & Funston 2014). The reasons for this are varying; for example, in Mpumalanga, development and infrastructure conflict with protecting more land for conservation, while in the Northern Cape high costs of land and predator-proof fencing inhibit further conservation efforts. This highlights the need to consolidate existing private reserves into conservancies and create larger, more ecologically-resilient populations (Di Minin et al. 2013). Secondly, the management of small reserve subpopulations requires a metapopulation plan to ensure they do not become a threat to genetic integrity through inbreeding (Miller et al. 2013; Miller et al. 2015). Genetic studies indicate that the southern African Lion would originally have constituted one large panmictic population (Barnett et al. 2006). However, there is very limited "free" movement of Lion between separate subpopulations today, which necessitates metapopulation management. This managed population may need to be occasionally supplemented with Lions from the larger protected areas (for example, KNP).

The total current (2013) mature population size ranges from 1,286 to 1,775 depending on the inclusion on the entire transfrontier conservation areas and small reserves (Table 2). Generation length is calculated as 6.5 years (Bauer et al. 2015), and the core population in the largest protected areas have remained stable or have increased over three generations. In southern Africa overall (Botswana, Namibia, South Africa and Zimbabwe), the population is inferred to have increased by 12% over three generations, whereas outside these countries the population has declined by 43% over the past 21 years (Bauer et al. 2015). The strongholds for Lions (Great Limpopo Transfrontier Park, KTP and HiP) provide enough mature individuals to exceed the D threshold alone.

In addition to wild Lions, there are many captive-bred Lions in most provinces, especially the Free State and North West provinces (Lindsey et al. 2012; Power 2014; Williams et al. 2015a). According to a study by Williams et al. (2015a), there are close to 6,000 Lions in captivity in approximately 70 breeding facilities. Although such Lions do not contribute to the wild and free-roaming population, they may serve as a significant buffer to threats facing the wild population by being the primary source of trophy hunting and derived products (SANBI 2012; Lindsey et al. 2012; Williams et al. 2015a).

Current population trend: Increasing

Continuing decline in mature individuals: No

Number of mature individuals in population: 1,511–1,775

Number of mature individuals in largest subpopulation: > 500

Number of subpopulations: 49

Severely fragmented: Yes. Most subpopulations are in small fenced reserves that require active metapopulation management.

Habitats and Ecology

Lions have a broad habitat tolerance and are only absent from tropical rainforest and the interior of the Sahara Desert (Nowell & Jackson 1996). They once lived across Eurasia, but now only a remnant population of a different subspecies (*Panthera leo persica*) survives in India. Lions are largely found in the savannah biome of Africa, which is broadly defined as those areas that receive between 300 and 1500 mm of rain annually, and encompass a wide variety of habitats including grasslands, wetlands, dry woodlands and mosaics of all of these (Riggio et al. 2013). They do locally exist in the Namib Desert in Namibia (Bauer & van Der Merwe 2004). Once extirpated from the

tropical thicket biome of the Eastern Cape in South Africa. Lions have recently been successfully reintroduced (Hayward et al. 2007).

Although Lions drink regularly when water is available, they are capable of obtaining their moisture requirements from their prey and even plants (such as the tsama melon in the Kalahari Desert), and thus can survive in very arid environments as they are water-independent (Green et al. 1984). Medium- to large-sized ungulates (190–550 kg, including antelopes, zebra and wildebeest) are the bulk of their prey (Hayward & Kerley 2005), but depending on circumstances, Lions will take almost any animal, from rodents to a rhinoceros. They also scavenge, displacing other predators (such as the Spotted Hyaena *Crocuta crocuta*) from their kills (Hayward 2006). Lions can only exist in areas with sufficient wild prey, and seldom co-exist closely with man. Within their home ranges, Lions require habitats or locations that are suitable for hunting, resting, and breeding. They readily adapt to hunting in varied habitats generally having greater success when hunting in areas with longer grass or cover (Funston et al. 2001). Although landscape features may vary from area to area, Lions tend to select areas where prey is easier to catch, rather than areas where prey densities are highest.

Lions are the most social of the cats, with related females remaining together in prides, and related and unrelated males forming coalitions competing for tenure over prides (West & Packer 2013). Average pride size (including males and females) is four to six adults; prides generally break into smaller groups when hunting (Smuts 1976). Lions tend to live at higher densities than most other felids, but with a wide variation from 1.5 adults / 100 km² in southern African semi-desert to 55 adults / 100 km² in parts of the Serengeti. Small fenced reserves in South Africa had average densities below 10 adults / 100 km² (Miller & Funston 2014). Pride home ranges can vary widely even in the same region: for example, from 266 to 4,532 km² in the South African part of the KTP (Funston 2001), and 45 km² in the Ngorongoro Crater, Tanzania (Hanby et al. 1995). Home ranges also vary widely within South Africa and do not appear to be linked to reserve size (Lehmann et al. 2008). For example, home ranges can vary hugely within a reserve, as evidenced on Makalali where Lions had home ranges from 25 km² to 107 km² (Druce et al. 2004).

Key habitat for Lions is directly driven by the presence or density of preferred prey species rather than any particular vegetation types – other than those associated with their preferred prey. As such, the vegetation communities that support the preferred prey of Lions range from semi-desert (Kalahari) through savannah (Kruger/Okavango) and subtropical thicket (Addo). In South Africa, however, the predominant subpopulations all occur within the savannah biome in the northern parts of the country.

Ecosystem and cultural services:

- This species is a keystone species and an apex predator. For example, Lions were reintroduced to Addo Elephant National Park in part to substitute the need to cull overabundant herbivores (Hayward et al. 2007), thus performing an ecosystem service of top-down population control.
- Lions are extensively used for ecotourism and are a prominent member of the "Big 5" (Di Minin et al. 2012; Maciejewski & Kerley 2014).
- Lions have huge commercial value in the trophy hunting industry, though there is controversy over such practices.

Use and Trade

South Africa's international trade in Lion products is sizeable. Besides trophies and live Lions, South Africa has issued CITES permits to export 19 categories of Lion products since 1977 ranging from hair to handbags, feet, leather items and tails (Williams et al. 2015a). Since 1992, South Africa has issued CITES permits to export at least 7,474 trophies, with an average of 351 ± 303 per year. However, from 2002 that average has increased to 565 ± 275 trophies per year. The trophies are primarily derived from legally hunted captive-bred Lions, and hunting predominantly occurs in the North West (77% of hunts from 2004 to 2010), Eastern Cape (10% of hunts) and Free State (6% of hunts) provinces (Williams et al. 2015a). Exports of trophies originating in South Africa increased markedly from c. 2006.

Despite the sizeable trade of Lions in South Africa, trophy hunting and trade is a negligible threat as utilization appears to be sustainable and wild populations are either stable or increasing. No hunting is allowed in national or provincial parks, which collectively represent > 75% of the total wild Lion population. Furthermore, less than 5% of trophy hunts are sourced from wild populations (CITES Scientific Authority South Africa 2013). For example, Lindsey et al. (2012) reported that the South African hunting operators estimated the proportion of wild Lions hunted annually to be only 0.9 and 1.1% of the totals for 2009 and 2010 respectively. The majority of trophy hunting is performed on private wildlife ranches (53%) or on properties with captive-breeding facilities (42%), where there are at least 6,000 Lions kept in captivity in at least 149 facilities across South Africa (Williams et al. 2015a). Although this population does not contribute to the wild population under assessment, it may act as a buffer to the wild population (Lindsey et al. 2012), as well as contributing to the South African economy. Besides trophies, CITES permits have been issued to export large numbers of live Lions across the world, as well as skeletons and bones to east-southeast Asia. From 1992 to 2012, CITES permits to export almost 1,400 live Lions (predominantly captive origin from the North West Province) were issued, 16% of these were destined for southeast Asia (mostly Thailand), and reached a peak of > 280 Lions in 2010 (Williams et al. 2015a).

In 2005, the process to develop stricter regulations relating to the hunting of captive-bred Lions was initiated and the provisions came into effect in 2007. These stricter regulations in terms of the National Environmental Management: Biodiversity Act (NEMBA), 2004 (Act No 10 of 2004) and, more specifically, the Threatened or Protected Species (ToPS) regulations, proposed that captive-bred Lions could only be hunted if they were released into an extensive self-sustaining (or 'free-roaming') system for a 2-year period. This regulation was challenged twice in court by the South African Predator Breeders Association (SAPBA) and, in 2010, SAPBA were successful in having the two-year period declared invalid for Lions (Williams et al. 2015a). Consequently, provinces apply regulations as per their provincial ordinances or guidelines, and this self-sustaining period varies across the provinces (for example, 96 hours in the North West, 30 days in the Eastern Cape, and 24 months in the Limpopo Province) (Williams et al. 2015a).

Table 3. Use and trade summary for the Lion (*Panthera leo*)

Category	Applicable?	Rationale	Proportion of total harvest	Trend
Subsistence use	Yes	Low-scale traditional medicine use.	Minority	Stable
Commercial use	Yes	Trophy hunting and export of skeletons.	Majority	Increasing
Harvest from wild population	Yes	Low incidences of poaching or illegal hunting.	< 5%	Stable
Harvest from ranched population	Yes	Occasional trophy hunting.	< 5%	Stable
Harvest from captive population	Yes	Extensive trophy hunting and exportation of parts for international markets.	95%	Increasing

In 2006 the IUCN SSC African Lion Working Group cautioned against allowing a legal trade in Lion bones based on a concern that a legal trade would be unable to meet the substantial demand for Lion bones in China. This demand was allegedly to replace tiger bones in Asian traditional medicines and tonics. According to Williams et al. (2015a), there is evidence that the legal trade in Lion bones had started by 2008. Before 2008, the only record of South Africa issuing CITES permits to export Lion skeletons was for three units to Denmark in 2001. However, Lion bone exports from South Africa have increased dramatically since 2008. From 2008 to 2011, the official number of skeletons legally exported with CITES permits totalled 1,160 skeletons (about 10.8 tonnes of bones), 573 of them in 2011 alone, with 91% of them destined for Lao People's Democratic Republic. The North West, Free State and Eastern Cape provinces, all home almost exclusively to captive-bred Lions, were the only provinces to issue export permits. Sixty-seven percent of the skeletons recorded on the export permits were from the North West and 25% from the Free State (Williams et al. 2015a). Lion bones are a sustainable by-product of the trophy industry and there was no evidence that any of these skeletons were obtained from wild Lions (Williams et al. 2015a). However, the longer-term sustainability of this practice is questionable, particularly if Asian consumers begin demanding wild rather than farmed or captive-bred products as consumer surveys indicate they prefer (Gratwicke et al. 2008).

Although there are no specific figures on illegal trade of Lions in South Africa, provincial conservation authorities indicate that illegal use or trade in Lion body parts and products is generally limited to negligible or non-existent. Furthermore, any illegal trade in Lions and their body parts usually involves restricted activities for which offenders are not in possession of a permit to breed, keep, hunt, catch, sell or export a live Lion or part thereof (Williams et al. 2015a). There is no known illegal trade in Lion in Gauteng, KwaZulu-Natal or the Eastern Cape and illegal utilisation of Lion within South Africa's national parks is negligible. Illegal trade in captive-bred Lions within North West Province is suspected to take place, as this province has the most facilities and is quite difficult to regulate. There are no reported records of illegal hunting of Lions in the Northern Cape. Any illegal hunting or trade in wild Lions is only likely to occur along the border between the Northern Cape and Botswana between Askham in the west and McCarthy's Rest in the east, a stretch of approximately 200 km, while Lions do also enter into the North West Province across the Molopo River (Power 2014).

Lions are used for traditional medicine and various trade studies conducted in Gauteng and KwaZulu-Natal urban traditional medicine markets have documented their body parts (usually bones and 'fat') for sale, but the quantities are small and the incidences sporadic (Whiting et al. 2011; Williams et al. 2015a). The expansion of human settlements on the western boundary of the KNP in Mpumalanga has been cited as a reason for the recent increase in Lion poaching for African traditional medicine (CITES Scientific Authority South Africa 2013), but these incidences too are sporadic. There have been anecdotal reports, however, that traditional healers living in areas adjacent to KNP acquire Lion body parts from healers working for SANParks – especially when dead animals become available (Williams et al. 2015a).

Overall, the private sector has been positive for the wild population. Some Lions have been removed from KTP to stock small reserves (for example, 6 in 2003 for Addo Elephant National Park), but this was not detrimental to the population. No Lions have been moved from KNP to small reserves. New reserves currently source their Lions from within the metapopulation. Some excess Lions from the metapopulation have ended up in captive facilities, but not vice versa. Thus, the system is self-contained and there is little leakage between the captive-bred, metapopulation and wild populations. The exception is the Mapungubwe area subpopulation where Lions get through the fences and onto managed properties (where legal hunting occurs) and are free-roaming on farmland (where they are occasionally killed by farmers) and cross international borders. There have not been extensive studies on whether this has any impact on the overall subpopulation in that area. The private sector too has greatly increased the commercial value of this species through trophy hunting. However, Lions are being increasingly reared in captivity for captive-bred hunting (*sensu* canned hunting), which negates the conservation value of these subpopulations. The majority of private wildlife ranches that contain subpopulations of conservation value are those large private nature reserves or conservancies who use Lions as an ecotourism drawcard.

Threats

There are no major threats to Lions in the assessment region. However, human-wildlife conflict and associated persecution may threaten local subpopulations, especially in the Mapungubwe region, and along protected area edges (*sensu* Wittemyer et al. 2008). Conflict on the borders of the KNP is relatively minor. For example, over the past 11 years, c. 135 complaints relating to wild animals killing livestock in the Nsikazi district adjacent to KNP have been received by Mpumalanga Tourism and Parks Agency (G. Camacho unpubl. data). Similarly, the conservation authority in North West Province reported two Lions shot for killing cattle in 2009 and one female

Lion shot in 2011, but it was never confirmed if these were wild or escapees from a captive facility, though these occurrences are rare in this province (Power 2014). In Gauteng, there is limited human-Lion conflict, which is closely managed by the authorities of the Dinokeng Game Reserve. As all Lions in the Eastern Cape are kept in areas that are protected with adequate fencing, there have been no human-Lion conflicts reported nor any livestock killed by Lion.

Lions are also accidentally killed in snares laid by bushmeat poachers. Poaching, snaring and poisoning of Lions remain a threat to free-roaming Lions in the Limpopo and Mpumalanga provinces. According to the IUCN SSC African Lion Working Group, Lions are lured from KNP into Mozambique and also across the Crocodile River by farmers for trophy hunting purposes. The illegal killing of problem animals and the illegal hunting of Lion for their skins are thought to be minor threats in KwaZulu-Natal Province.

Disease has also been a threat to free-roaming Lion population, especially Bovine Tuberculosis in KNP and HiP. This is especially prevalent for inbred subpopulations (Trinkel et al. 2011), which is exacerbated by the fragmented and isolated nature of most subpopulations within the region. Bovine Tuberculosis is not spread within Lion subpopulations through intraspecific interactions, it can only be sustained in the population through infected prey, particularly buffalo (Maruping-Mzileni 2015). The high numbers of domestic and feral dogs and cats associated with the expanding human population bordering the western side of KNP also enhances the possibility of transmission of diseases such as canine distemper and rabies. Within KNP, Bovine Tuberculosis has not had any detectable impacts on the Lion population and disease threats within this national park are minimal (Ferreira & Funston 2010) and research demonstrates that infections of Bovine Tuberculosis and Feline Immunodeficiency Virus do not co-vary (Maas et al. 2012). Future threats to Lions in KwaZulu-Natal Province are speculated to be disease, primarily Bovine Tuberculosis and Canine Distemper Virus.

Although prey-base depletion and habitat loss is listed as a major threat to the global Lion population (Bauer et al. 2015), the expansion of small, private protected areas with high prey numbers has counteracted this threat on a local scale in South Africa (Miller et al. 2013). Conversely, artificially high Lion numbers negatively impact the abundance of other predators and need to be managed so as not to affect overall diversity.

The popular media emphasises the threat of trophy hunting on Lions in South Africa, but the overwhelming majority of trophy hunts are taken from the captive-bred population, which leaves the wild and free-roaming population largely unscathed (SANBI 2012). Lindsey et al.

Table 4. Threats to the Lion (*Panthera leo*) ranked in order of severity with corresponding evidence (based on IUCN threat categories, with regional context)

Rank	Threat description	Evidence in the scientific literature	Data quality	Scale of study	Current trend
1	*5.1.3 Persecution/Control*: indiscriminate killing to protect livestock.	-	Anecdotal	-	Stable, but minimal impact on overall population.
2	*2.1 Annual & Perennial Non-Timber Crops*, *2.3 Livestock Farming & Ranching* and *1.1 Housing & Urban Areas*: loss of habitat from agricultural and residential expansion. Current stresses *2.3.5 Inbreeding* and *2.1 Species Mortality*: inbreeding due to fragmented subpopulations and increased persecution rates.	Trinkel et al. 2011	Empirical	Local	Fragmentation: increasing with new reserves, but minimal in last 5 years. Inbreeding: potential to increase with more small reserves, but metapopulation plans are addressing this.
3	*8.1 Invasive Non-Native/Alien Species/ Diseases*: Bovine Tuberculosis and Feline Immunodeficiency Virus outbreaks / epidemics.	Ferreira & Funston 2010	Empirical	Local	Stable in Kruger National Park; controlled on small reserves.
		Trinkel et al. 2010	Empirical	Local	
		Trinkel et al. 2011	Empirical	Local	
		Maas et al. 2012	Empirical	Local	
4	*5.1.2 Hunting & Collecting Terrestrial Animals*: incidental mortality from snaring during bushmeat hunting.	-	Anecdotal	-	Increasing, but minimal impact on overall population.
5	*5.1.1 Hunting & Collecting Terrestrial Animals*: trade in Lion bones which are sourced predominantly from captive-bred population.	Williams et al. 2015a	Empirical	National	Increasing, but no discernible impact on wild population yet.

(2012) warn that if the captive-bred Lion industry were to become increasingly regulated, in part due to pressure from animal welfare activists, the demand for wild Lion trophies would increase and thus the management of wild Lions would need increased regulation, stricter penalties and greater enforcement. Thus, the captive-bred population effectively buffers the wild population and reduces the associated conservation costs (Lindsey et al. 2012). Similarly, while the trade in Lion bones to east-southeast Asia has been cited as a potential threat in South Africa, evidence suggests that the trade is not adversely impacting wild Lion subpopulations in South Africa because the skeletons are almost all a by-product of the sizeable trophy hunting industry, and Lions that are hunted in South Africa are almost exclusively captive-bred (Williams et al. 2015a). In addition to wild-hunting, there are few records of Lion poaching – especially at a level that could supply the sizeable bone trade (Williams et al. 2015a). There are concerns, however, that the trade in Lion bones to China and southeast Asia could stimulate demand for wild Lion bones and other felids (Lindsey et al. 2012), and thus this situation needs to be closely monitored (especially elsewhere in Africa where too little is known of the bone trade) and the assessment re-evaluated if new data become available that indicates that the bone trade is a threat to wild Lions within the assessment region.

Current habitat trend: Stable/increasing. The savannah biome is well protected and the current area of occupancy is expanding through private protected areas.

Conservation

While there are no pressing interventions necessary for large, formally protected areas, developing a management plan for reintroduced Lions on small reserves (< 1,000 km^2) is the primary conservation intervention (Miller et al. 2013). The Lion Management Forum (LiMF) was formed in 2010 to develop such management guidelines. LiMF bases its recommendations on the premise that managers should try to mimic natural processes that have broken down in reserves, using proactive rather than reactive methods. Specifically, managers should attempt to reduce Lion subpopulation growth and thus reduce the number of excess Lions in the metapopulation; disease threats should be reduced through vaccination whenever animals are translocated; and genetic integrity should be monitored throughout the metapopulation (Miller et al. 2013). As part of the metapopulation strategy, new sites for reintroduction should be identified. Founder groups to new areas should be as large and genetically diverse as possible (Trinkel et al. 2010). Research demonstrates that inbred Lions are more susceptible to Bovine Tuberculosis and that translocating outbred Lions into the area can mitigate losses (Trinkel et al. 2011). However, care must be taken not to introduce new diseases into subpopulations through translocation. An adaptive management framework is thus needed to implement the guidelines developed by LiMF on reserves across the country. Ongoing monitoring of subpopulation responses to the management actions should improve management of Lions on small reserves in South Africa. This approach will provide a template for evidence-based conservation management of other threatened carnivores.

The second most important conservation strategy for all Lions, both within small reserves and those within transfrontier parks or large national parks, is protected area expansion. Plans for expanding the protected area system are underway in a number of provinces. Through the development of privately owned nature reserves in Gauteng, it is hoped that available habitat will expand in the near future and the Lion population will increase. A process has been initiated in North West Province to identify critical biodiversity areas for the expansion of the protected area system, which will also possibly involve reintroductions of further free-roaming Lion subpopulations. Similarly, a Park Expansion Strategy is currently being implemented by the Mpumalanga Parks and Tourism Agency and as the area of available habitat

Table 5. Conservation interventions for the Lion (*Panthera leo*) ranked in order of effectiveness with corresponding evidence (based on IUCN action categories, with regional context)

Rank	Intervention description	Evidence in the scientific literature	Data quality	Scale of evidence	Demonstrated impact	Current conservation projects
1	*3.3.1 Reintroduction*: further translocation and reintroduction under a metapopulation plan to increase occupancy and reduce the effects of inbreeding.	Trinkel et al. 2011	Empirical	Local	> 30% of inbred Lions died from Bovine Tuberculosis or malnutrition compared with < 2% of the translocated Lions and their offspring	Lion Management Forum
2	*1.1 Site/Area Protection*: protected area expansion, especially transfrontier areas, to increase subpopulation resilience.	Miller et al. 2013	Review	National	30% increase in Lion numbers over 10 years.	Lion Management Forum
3	*3.1.3 Limiting Population Growth*: sustaining Lion numbers at ecological densities.	Trinkel et al. 2010	Empirical	Local	Saturated subpopulations show lower growth rates.	Lion Management Forum
4	*3.2 Species Recovery*: pre-emptive vaccination prior to translocation/ reintroduction.	-	Anecdotal	-	-	Lion Management Forum
5	*2.1 Site/Area Management*: site-specific conflict mitigation measures, including the use of livestock guarding dogs.	Rust et al. 2013	Indirect	Local	Livestock depredation rates reduced.	-
		McManus et al. 2015	Indirect	Local		

for Lion is secured, reintroduction of Lion will be possible. There are currently four areas that could support healthy Lion populations in Mpumalanga, including the Loskop Dam Nature Reserve area, the Nkomazi Wilderness area, the Lydenburg/Burgersfort/Steelpoort area and the Andover area in the Lowveld. Although, in order to realize this, current development trends in these areas will need to be managed. While fencing has been shown to be effective in reducing conflict and increasing Lion subpopulation size (Packer et al. 2013), it also increases isolation, and thus, while small fenced reserves are necessary, continued transfrontier protected area expansion is necessary to create more resilient and self-sustaining subpopulations.

The use of livestock guarding dogs and improved livestock husbandry should be trialled in the Mapungubwe region to reduce conflict between the small free-roaming subpopulation and local communities (Marker et al. 2005). While various pilot projects have been established in Limpopo, North West, Northern and Western Cape provinces, little research has been done about their overall effectiveness within the assessment region, especially for Lions. Preliminary findings suggest that livestock guarding dogs can decrease depredation by 69% (McManus et al. 2015).

Recommendations for land managers and practitioners: The lack of a sound metapopulation management plan for these small reserves undermines the conservation value of the privately protected subpopulations and increases the risk of inbreeding (Björklund 2003). To redress this, the LIMF was established to draft a metapopulation management strategy for Lions (Miller et al. 2013). LIMF is run by independent individuals interested in Lion management on small reserves and has been very successful in providing a forum for managers, scientists and, more recently, government organisations, to discuss Lion management issues unique to small reserves. Landowners and interested stakeholders are encouraged to participate.

Similarly, the Department of Environmental Affairs has developed a Biodiversity Management Plan (BMP) for Lions in terms of the National Environmental Management: Biodiversity Act, 2004. The BMP is aimed at ensuring the long-term survival of the species in nature and will contribute towards the achievement of the recommendations of the Eastern and Southern African Lion Conservation Strategy (the regional conservation strategy compiled by the IUCN SSC Cat Specialist Group, 2006).

Research priorities:

- Comprehensive contraception study to test the efficacy and effects (physiological and behavioural) of chemical and surgical contraception of Lionesses to reduce growth rates on small reserves.
- Effects of Bovine Tuberculosis on tenure and male take over in Lions of KNP.
- Quantifying and monitoring the effects of Lion bone trade on the wild Lion population within the assessment region.
- Exploring interventions to reduce human-Lion conflict.

Encouraged citizen actions:

- Contribute to citizen science projects within protected areas (by reporting sightings locations and pride numbers), and report sighting data on virtual museum platforms (for example, iSpot and MammalMAP) outside of protected areas.
- Support protected areas and nature reserves over Lion parks or captive centres, as the latter institutions do not have conservation value for Lions (Hunter et al. 2013).

Data Sources and Quality

Table 3. Information and interpretation qualifiers for the Lion (*Panthera leo*) assessment

Data sources	Census (literature); field study (literature, unpublished)
Data quality (max)	Observed
Data quality (min)	Estimated
Uncertainty resolution	Total count; confidence intervals
Risk tolerance	Evidentiary

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Details of the methods used to make this assessment can be found in *Mammal Red List 2016: Introduction and Methodology*.

the conservation value of the captive lions lay in the fact that for every captive lion hunted there is one less wild lion hunted. So the captive lion industry absorb a lot of the hunting pressure that the wild lions would have endured. So in short 80 % of the lion trophy fees are spent on taking care of my breeding projects and taking care of my lions. The other 20 % is spent on running my game preserve and taking care of other wild animals and paying very good salaries to my workers. All my workers live in brick houses with free electricity. They have hot and cold running water in their houses with showers and flush toilets. They earn much higher wages than the neigboring ranches and are far above the minimum wages. All of this is only possible if we can hunt lions. Without lion hunting we will get rid of all wild animals and go back to cattle ranching.

Question 9 c. Other funding activities is that we belong to SAPA and as a SAPA accredited ranch we have to donate R10 000 for every lion hunted to SAPA's conservation fund.
SAPA will be more qualified to expand on some of the conservation projects but what I know is that SAPA has released two prides of captive bred lions on different game reserves and on both these projects the captive bred lions have adapted to catching their own game without any problems or any lions dying. In fact both projects were so sucessful that the females started breeding and raised their own babies in the wild. With both these projects they proved the GREEN movements wrong who said captive lions cannot be released in the wild and therefore have no conservation value. Other projects that SAPA was involved in was that they bought and supplied collars for a lion research project on wild lions in the Zambesi valley in Zimbabwe. Another project was that SAPA bought a vehicle for anti poaching patrols in Tanzania. So all these projects that SAPA does. have a huge conservation benefit to wild lion populations. Through our donations (R10 000 per lion) we contibute with every lion hunted to SAPA's conservation fund. We also have a game auction once a year where every member have to donate a hunt or animals. etc. to be auctioned off for the benefit of the conservation fund. In addition we pay a membership fee to SAPA and that money also end up in the conservation fund.

That is about as much information as I have.
You are welcome to contact SAPA's CEO Mr Deon Swart on 083-616-8104 for more detailed information.
SAPA has done a lot for lion conservation and all with money that came from hunting captive bred lions.
SAPA has got a very strict list of norms and standards that each memebr must abide by.
So far only 8 ranches has been accredited by SAPA. That is how high the standard is.

Question 9B - 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?

Trophy fee of $ (Please insert value) was paid to hunt Mr. Rogers lion. Of this, the funds were used as follows: (SEE ATTACHED)

- Government - a portion is paid to local government for the licences/permits for every lion hunted. This money is intended for use in the further conservation of the species and upliftment of rural communities.
- Landowner - 80 % of the funds received by the landowner are spent directly on lion conservation, through the upkeep and growth of lion breeding projects and taking care of lions in the landowners breeding programme. The remainder is spent on running costs and upkeep of the total reserve, including conservation of other wild animals inhabiting it and employment creation/payment of salaries to people employed from the local community.

Question 9C - 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

The landowner is a member of SAPA (South African Predator Association) and as a SAPA accredited ranch, they agree to donate R10 000 for every lion hunted to SAPA's conservation fund. Some of the conservation efforts initiated by SAPA:

- Released two prides of captive bred lions on different game reserves and on both these projects the captive bred lions have adapted to catching their own game without any problems or any lions dying. In fact both projects were so sucessful that the females started breeding and raised their own babies in the wild. With both these projects they proved skeptics wrong who said captive lions cannot be released in the wild and therefore have no conservation value.
- Bought and supplied collars for a lion research project on wild lions in the Zambesi valley.
- SAPA bought a vehicle for anti poaching patrols in Tanzania.

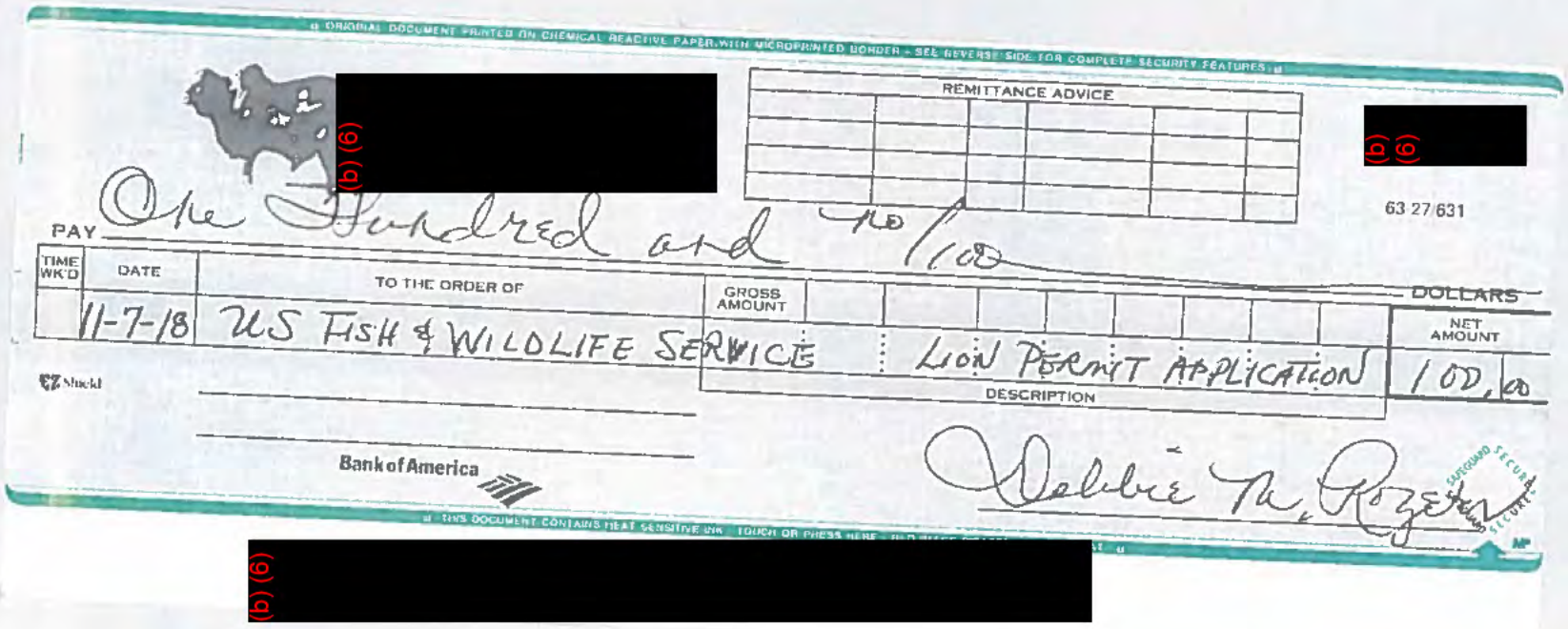
Members also have a game auction once a year where every member have to donate a hunt or animals, etc. to be auctioned off for the benefit of the conservation fund. In addition a membership fee is paid to SAPA and that money also end up in the conservation fund.

So in short, all these projects that SAPA does, have a huge conservation benefit to wild lion populations and lion conservation.
For further information, please contact SAPA's CEO Mr Deon Swart on 083-616-8104 for more detailed information.
SAPA has got a very strict list of norms and standards that each member must abide by.
So far only 8 ranches has been accredited by SAPA. Below is a summary of major achievements since 2012:

SAPA Achievements (Since 2012)

- Establishment of South Africa Predator Association.
- SAPA Norms and Standards for Hunting Ranch Lions.
- Assessment of lion hunting destinations for accreditation.
- Accreditation of a number of hunting destinations.
- Establishment and implementation of the marking system "tags" for hunting of ranch lions.
- Establishment of DNA profiling databases for ranch lions - 1000 Lion samples in Databases.

- Establishing "traceability" of Ranch lions.
- Liaison with National Department of Environmental Affairs on the trade of lion and lion derivatives.
- Liaison with Provincial Biodiversity Management Authorities through Wildlife forum meetings.
- Comments and inputs in Provincial and National legislation managing the lion industry.
- Draft Norms and Standards: Lion rearing and management. – In process with DAFF.
- Involvement in Wild lion conservation project in Zimbabwe.
- Bursary to University of North West: Lion Research.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5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD NOV 14 2018

RE: Import Application of Zambia Lion and Leopard Trophies for Theodore Fowler

Dear Chief Cogliano:

Enclosed please find the permit applications to import a lion and leopard trophy from Zambia for Theodore Fowler. Also attached to the permit applications is an operator enhancement questionnaire provided by Lumimba Mwanya- MVU Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion and leopard trophy imports.

Unfortunately, this application was misplaced in our office by a trainee months ago so we would appreciate any courtesy in expediting the processing.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Theodore Fowler Lion Permit Application, 100.00 Check and Notice of Representation
- Theodore Fowler Leopard Permit Application, 100.00 Check and Notice of Representation
- Lumimba Mwanya- MVU Safaris Operator Enhancement Questionnaire

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 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: Theodore M. Fowler (b) (6)

Name: Theodore M. Fowler (b) (6)

Date: 07/18/18

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Lion

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Fowler	Theodore	Meredith	(b) (6)

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Raleigh	North Carolina	(b) (6)		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. 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.

Theodore Meredith Fowler (b) (6)

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)

7/18/18

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: 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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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.

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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 regular mail through the U.S. Postal Service.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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 X 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.

      LION

   b. Sex (if known).

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:

      N/A

   b. Date wildlife is to be hunted:

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

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:

      Zambia, Mwanya GMA

   b. Date wildlife was hunted: 29 June 2018

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

      MVU Safaris Zambia Limited

   c. 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]:

      MVU Safaris 6980 Katanga Road Lusaka, Zambia

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). Attached

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: MVU Safaris Zambia Limited
   Business Name: MVU Safaris
   Address: 6980 Katanga Road Lusaka
   City: Lusaka
   State/Province: Zambia
   Country, Postal Code: 10101

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?

   Please see attached documentation.

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United Sta(b) (6)annot be re-exported.

    Applicant's signature: _____ Date: 7/18/18

    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.

All international shipment(s) must be imported 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).

#7 page 1 of 3

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

0000568

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue: Chilanga Date of Issue: 08/6/18

DETAILS OF PERMIT HOLDER

II name: Theodora Fowler NRC/Passport No: (b) (6) [redacted]

Tel/Mobile No.: ..... E-mail address: .....

Postal Address: Box 35225 Lsk Residential Address: USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 903 2. ..... 3. .....

Calibre(s) 1.: 416 2. 7mm 3. .....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No .....

Hunting Type: Non Resident

is hereby authorised to hunt in Lumimba Game Management Area,

Mwanya Hunting block for 14 days from 11/6/18

to 24/6/18 (Dates inclusive)

Amount Paid: $150 GRZ Receipt No: 0043533

Official Stamp

- 8 JUN 2018

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

#7 Page 2 of 3

NPW FORM 12

S/No. 0000155

ORIGINAL

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 14 of 2015)
(Licences and Fees) Regulations, 2007
(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SAEED ABDUL KARIM NRC/Passport No. (b) (6) [redacted]
Residential Address: 219/M NAKATINDI RD LIVINGSTONE
Name of Safari Company on behalf of which the Professional Hunter is submitting this return: MVU SAFARIS

DETAILS OF CLIENT
Name of client: THEODORE FOWLER NRC/Passport No: (b) (6) [redacted]
Tel/Mobile No. AMERICAN Nationality: U.S.A
Postal Address Residential Address
Type of Licence: CLASSICAL Licence No: 0000369
Date of Issue: 08-6-18 Place of Issue: CHILANGA
Name of Hunting Block where hunting was conducted: LUMIMBA / MWAMYA
Hunting period From: 11-6-18 To: 01-7-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
25-6-18	HIPPO	M	ONE	NIL	[illegible]	✓		LH 000073
26-6-18	Bushbuck	M	ONE	NIL	[illegible]	✓		LH 0000429
28-6-18	ELAND	M	ONE	NIL	[illegible]	✓		LH 0000761
29-6-18	LION	M	ONE	NIL	[illegible]	✓		LH 0000423
1-7-18	CROCODILE	M	ONE	NIL	[illegible]	✓		

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
HIPPO		28"		
Bushbuck			15.2	
Eland		28"		
Lion				26
CROCODILE	13 FEET			

Certification by -

(a) Client
I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter
I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date.....
Date.....
Date.....

Signature of Client.....
Signature of Professional Hunter EMMANUEL BANDA
Name of Wildlife Police Officer
Employment No. of W.P.O. 2400069
Signature of W.P.O.

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

#7 page 3 of 3

NPW FORM 12

0000154

S/No.....

ORIGINAL

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: SAEED ABDUL KARIM NRC/Passport No. (b) (6)

Residential Address: 219/M NAKATINDI ROAD - LIVINGSTONE

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Mvu Safaris

DETAILS OF CLIENT

Name of client: Theodore Fowler NRC/Passport No: (b) (6)

Tel/Mobile No..... Nationality: American

Postal Address..... Residential Address: USA

Type of Licence: Classical Licence No.: 0000568

Date of Issue: 8-6-18 Place of Issue: CHILANGA

Name of Hunting Block where hunting was conducted: LUMIMBA

Hunting period From: 11-6-18 To: 24-6-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
HIPPO 11/6	HIPPO	M	ONE	NIL		✓	✗	0000432
PUKU 17/6	PUKU	M	ONE	NIL		✓		237
18/6/18	LEOPARD	M	ONE	NIL		✓		0000424
19/6/18	WARTHOG	M	ONE	NIL		✓		0000154
20/6/18	BUFFALO	M	ONE	NIL		✓		0000426

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
HIPPO		27'		
PUKU		18'		
LEOPARD				15.3'
WARTHOG				13'
BUFFALO			37'	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date..... Signature of Client.....

Date..... Signature of Professional Hunter.....

Date..... Name of Wildlife Police Officer.....

Employment No. of W.P.O. 210008[illegible]

Signature of W.P.O. Emmanuel Banda

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Conservation Force
Operator Enhancement Questionnaire

v 5/8/18

#9
(7 pages)

1. Name of area operator: **_LUMIMBA MWANYA-MVU SAFARIS**_____

   a. Years in business: **___EIGHT YEARS YEARS**_____

   b. Name of company conducting hunt: **___MVU SAFARIS**_____

   2. Name of concession: **_LUMIMBA MWANYA GMA__** Size in km^2: **__1603 KM2_(LUPANDE)___**

   a. Land tenure: __ Government lease _x_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: **____SEVEN YEARS_____** Can it be renewed? **_X_** Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **_YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA.THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE**

   _____

   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **_____NEAREST TOWN IS MFUWE____**

   e. If the concession borders a national park, please provide the park name: **__SOUTH LUANGWA NATIONAL PARK**_____

   f. Description of general and distinctive habitat features and any water features: **_HABITAT INCLUDES SAVANNA GRASSLANDS,MOPANE WOODLANDS AND LAGOONS THE LUANGWA RIVER FLOWS THROUGH THE GMA**_____

3. Are there any communities living in the concession? **_X_** Yes __ No

   a. If so, estimated number of people or villages in the concession? **_ABOUT 200 PEOPLE ONLY IN ONE VILLAGE IN THE GMA**

4. Are there communities bordering this concession? **_X_** Yes __ No

   a. If so, estimated number of people or villages around the concession? **_THE POPULATION IS SPARSE AROUND THE GMA**_____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**ABUNDANT**	**600 AND ABOVE**	**UPWARD**	**PATROL DATA AND OBSERVATIONS**
Lion	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Leopard	**FREQUENT**		**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**
Prey species	**ABUNDANT PREY BASE**	**ABUNDANT**	**UPWARD**	**-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA**

6. Total employment number: **__20 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS**_____

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	TWELVE	TWELVE
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: _____SKINNERS_____	THREE	THREE

7. Number of staff employed in the off-season: **_FIVE (5)**_____

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	12	12	THROUGH OUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	20	**BEGINNING OF THE SEASON**
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: _____**TWELVE**_____

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? __**BOTH**_____

c. Months during which anti-poaching patrols are conducted: __**THROUGH OUT THE YEAR**_____

d. Number of anti-poaching patrols per month: ___**WE DO THREE PATROLS**_____

e. Description of anti-poaching equipment, vehicles, etc.: _____**TWO 4X4 LANDCRUISERS, SATELLITE PHONES AND FIREARMS**_____

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? ___**WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**_____

g. Do you offer rewards to poaching informants leading to arrest? X__ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _X_ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ____**ZAMBIAN KWACHA**_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	140 800	140,800	140,800	AMOUNT FOR 12 SCOUTS PER ANNUM

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Equipment	50,000	43,000	30,800	UNIFORMS,BOOTS,TORCHES,RAINCOATS ETC
Vehicles	400,000			USED TO BUY A LANCRUISER IN THE FIRST YEAR DONATED TO DNPWS
Petrol	57,600	55,100	56,200	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	10,000	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _____				
Other: _____				
TOTALS	**660,400**	**246,900**	**237 800**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	201	115	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	8	2	3	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	81	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	5	0	1	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	558	402	289	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	27	19	7	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY

				ARE REMOVED FROM THE ELEPHANT
Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __**WE PAY 170,000 KWACHA AS COMMUNITY OBLIGATION AND 90,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT.THIS IS CONTAINED IN THE CONTRACT.BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS,CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES**_____

c. Does the company provide game meat to nearby communities? X__ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **the meat contribution program: 50% OF EADIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**_____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. __**OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**_____

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? ____**ZAMBIAN KWACHA**_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	13,000	33,700	41,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _**ZAMBIAN KWACHA**__

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		90,000	135,000	Most of the schools in this Area are in a deplorable state.MVU safaris has embarked on a program to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS		**90,000**	**135,000**	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	2(40%)	8 (60%)	10(62%)
-- hunting lion	0	2	2
-- hunting elephant	0	2	2
-- hunting leopard	3	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: ___**50%**_____

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

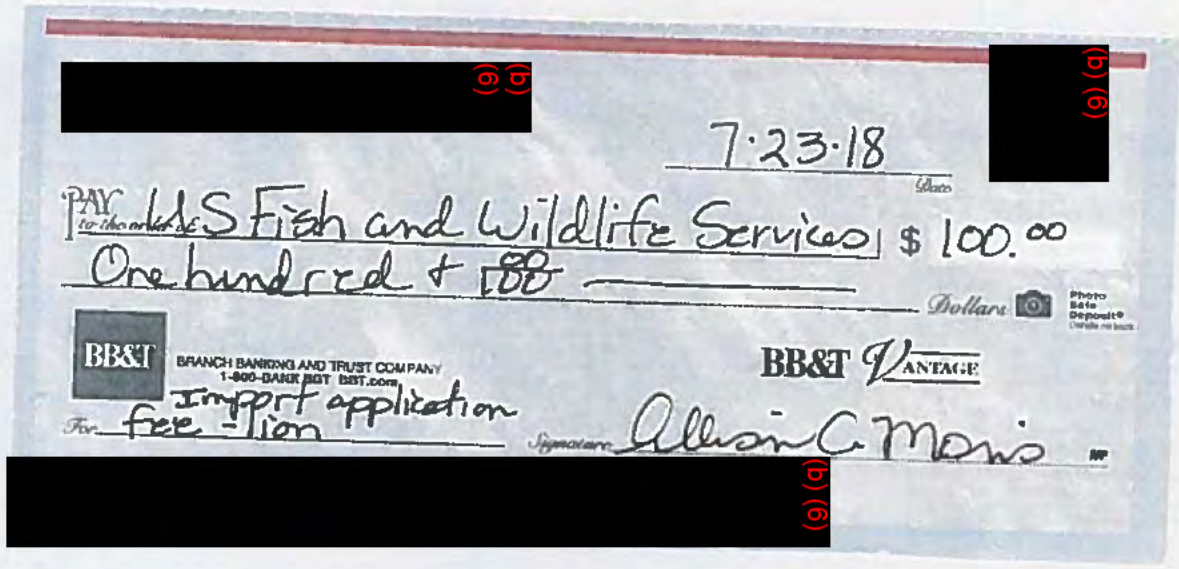
-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____MUHAMMAD SAEED ESSA_____

Name: _____MUHAMMAD SAEED ESSA_____ Title: _____DIRECTOR____


[redacted] (b) (6)

[redacted] (b) (6)

7·23·18

PAY to the order of US Fish and Wildlife Services $ 100.00

One hundred + 00 Dollars

Photo Safe Deposit®

BB&T

BRANCH BANKING AND TRUST COMPANY
1-800-BANK BBT BBT.com

BB&T VANTAGE

For Import application fee -tion

Signature Allison C. Morris

[redacted] (b) (6)

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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October 25, 2018

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

RE: Import Application of Zimbabwe Lion Trophy for Frank Cavallo

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zimbabwe for Frank Cavallo . Also attached to the permit application is enhancement information provided by the Zambizi Hunters Safari Company. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Frank Cavallo's Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my applications for a permit to import a lawfully hunted 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 the attorney, 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: Francesco CAVALLO MD

Date: 11/13/18

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

LB

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: Lion Zimbabwe

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cavallo	Francescomaria	Tiberio	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
El Campo	Tx	(b) (6)		U.S.A.

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. 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.

11/13/18

Signature of applicant/Principal Officer 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: 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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

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 X 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.

4. 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

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:

   b. Date wildlife is to be hunted:

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

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:

   b. Date wildlife was hunted: 09/16/18

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

   Zambezi Hunters

   c. 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]:

   Trophy Consultants International 4 Josiak Chinamano Rd Belmont, Bulawayo, Zimbabw

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).

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

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?

   See attached.

   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?

   $44,252

   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?

   See attached.

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 11/13/18

    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.

All international shipment(s) must be imported 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).

SANGO
save valley conservancy

PABST HOLDINGS ZIMBABWE PRIVATE LIMITED

31 October 2018

Replies to questions posed by the US Fish and Wildlife Service for the Male Lion hunted by Mr Frank Cavallo.

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? The male lion was hunted on Sango, a 60'000'Hec property within the Save Valley Conservancy (240'000' Hec) Sango carries a lion population of +/- 80 lion and the Save Valley has a population of 223 lion, these figures from the 2017 predator spoor survey. The lion population in the Save Valley has grown from a population of 40 in 2005 to 223 in 2018 due to good management, and abundant prey populations. The recommended sustainable hunting percentage for male lion is 8%,
Sango could ask for 6 male lions, in the interests of conservation and sustainable utilisation, Sango normally hunts 2.

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?

Total fees paid $..... The fees paid to Sango run the property, they help pay; 130 staff of which 44 are game scouts, water pumping and pipe line repairs, fire breaks, infrastructure maintenance etc. Sango also assists 4 local schools that are situated along its boundaries and maintains 9 community boreholes.

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? Sango was founded in 1993 and has since grown a sizable population of wildlife ,the property is funded by sustainable use conservation (Hunting). The success of Sango can be measured by the fact that Sango restocked 1300 plains game animals into the Gonarezhou and Zambezi National Parks in 2013 and translocated 100 elephant to the Rifa conservation area in the Zambezi Valley in 2018 due to over populations on Sango.

Please contact me if any further information is needed; David Goosen sangohq@sango-wildlife.com

PABST HOLDINGS ZIMBABWE (PTY) LTD
trading as SANGO RANCH, P.O. Box 24, BIRCHENOUGH BRIDGE, ZIMBABWE
WEB: www.sango-wildlife.com * E-MAIL: sangohq@sango-wildlife.com
PHONE: +263 712 412 574 * +263 712 421 794 * +263 773 080 691

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: ZAMBEZI HUNTERS

   a. Years in business: 40 YRS

   b. Name of company conducting hunt: ZAMBEZI HUNTERS

2. Name of concession: SAVUTI Size in km²: [illegible]

   a. Land tenure: __ Government lease __ Community __ Private ranch __(Private conservancy

   b. Length of concession agreement: N/A Can it be renewed? __ Yes __ No N/A

   c. Length of renewal, if applicable: N/A

   d. Estimated total amount received in trophy fees last year, if applicable: $114 200

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   STANDARD CONCESSION OBLIGATIONS

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   BOTSWANA, NORTHWEST CORNER NATIONAL

   g. If the concession borders a national park, please provide the park name: N/A

   h. Description of general and distinctive habitat features and any water features:
   SAVUTI RIVER, MORAMI RIVER, 9 DAMS IN MAIN

3. Are there any communities living in the concession? __ Yes __(No)

   a. If so, estimated number of people or villages in the concession? N/A

4. Are there communities bordering this concession? __(Yes) __ No

   a. If so, estimated number of people or villages around the concession? 3500

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	DENSE	534	UP	AERIAL COUNT
Lion	DENSE	120	UP	" "
Leopard	DENSE	193	UP	" "
Prey species	DENSE		STABLE	" "

6. Total employment number: 150

   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type:	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	[illegible]	
Trackers	[illegible]	
Anti-poaching scouts/rangers	44	
Other anti-poaching	0	
Cooks/housekeepers	17	[illegible]
Community coordinators	[illegible]	
Managers	3	
Biologists	1	
Others:	[illegible]	

7. Number of staff employed in the off-season: [illegible]

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff			
Managers			
Maintenance			
Road opening/construction	[illegible]		
Community relations personnel	[illegible]		
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 44

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? [illegible]

   c. Months during which anti-poaching patrols are conducted: [illegible]

   d. Number of anti-poaching patrols per month: [illegible]

   e. Description of anti-poaching equipment, vehicles, etc.: [illegible]

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? [illegible]

   g. Do you offer rewards to poaching informants leading to arrest? (Yes) No

   h. Do you offer rewards to poaching informants upon conviction? Yes (No)

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? USD

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts			11 600	
Equipment			11 000	
Vehicles			NIL	
Petrol Diesel			10 120.	
Rewards paid			3 000	
Other:				
Other:				
TOTALS			147 520	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered			1	
Elephant carcasses observed			NIL	
Lion carcasses observed			NIL	
Leopard carcasses observed			NIL	
Ivory poachers arrested			NIL	
Meat poachers arrested			1	
Other poachers arrested			NIL	
Poachers convicted			1	
Snares/gin traps collected			NIL	
Firearms confiscated			NIL	
Vehicles confiscated			NIL	
Bicycles confiscated			NIL	
Boats/nets confiscated			NIL	
Tusks recovered			NIL	
Other:				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? (Yes) __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? [illegible]

c. Does the company provide game meat to nearby communities? __ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: [illegible]

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NIL

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other:				
Other:				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2 2016: 1 2017: 0	2015: 2 2016: 2 2017: 1	2015: 5 2016: 4 2017: 3	2015: 2016: 2017:
Percentage of U.S.	2015:	2015:	2015:	2015:

clients	2016: 1 2017: 0	2016: [illegible] 2017: 1	2016: 4 2017: [illegible]	2016: [illegible] 2017: 11
Trophy fees paid by U.S. clients	2015: [illegible] 2016: 19,500 2017: [illegible]	2015: [illegible] 2016: [illegible] 2017: [illegible]	2015: [illegible] 2016: [illegible] 2017: 15,000	2015: [illegible] 2016: [illegible] 2017: [illegible]

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:
$300 000

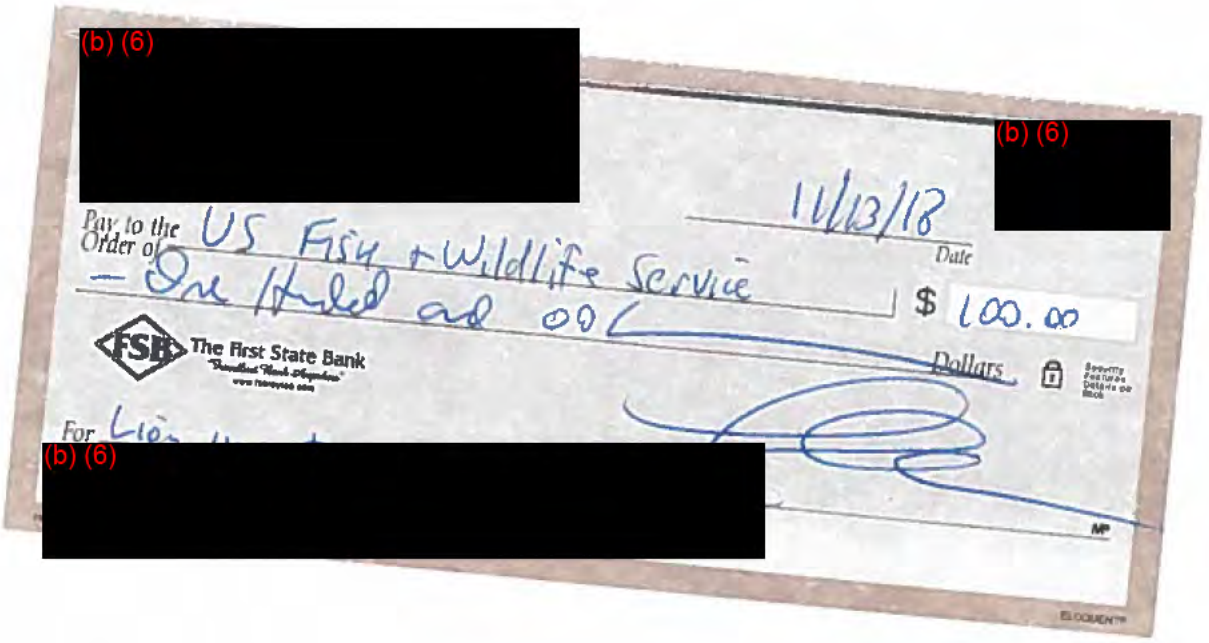
13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: [illegible]

Name: [illegible] Title: [illegible] Zambezi Hunters

13 - Annual aerial survey of all wildlife species
- monitoring of age & trophy sizes of all animals harvested
- 40 000 acre [illegible] hunting zones
- Significant investment in [illegible]
- community projects [illegible] [illegible]
- ~~Artificial water provision~~ [illegible]
- Artificial water provision and program
- on site ecologist employed to monitor wildlife and vegetation.
- Total cost of managing [illegible] $850,000, revenue from hunting and tourism
[illegible]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Pay to the Order of US Fish + Wildlife Service
11/13/18
Date
— One Hundred and 00/
$ 100.00
Dollars
The First State Bank
FSB
For
(b) (6)

CONSERVATION FORCE
A Force For Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
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February 9, 2018

RCVD FEB 12 2018

13

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

Re: Application for Import of a Sport-Hunted Lion Trophy

Dear Chief Van Norman:

Enclosed please find one application to import a sport-hunted lion trophy taken in Zambia in 2017. This lion was hunted with Andrew Baldry of Royal Kafue Safaris. Conservation Force provided specific enhancement information regarding Royal Kafue and we respectfully request that this permit be approved upon consideration of the information previously submitted by Conservation Force and the Department of National Parks and Wildlife in Zambia.

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

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 application for a permit to import a leopard and a threatened-listed lion trophy from Africa.

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 be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion 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: [redacted] Park

Name: Mance [redacted] Park

Date: 02/06/2018

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
(Appendix I of CITES and/or ESA)

LB

RCVD FEB 19 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Park	Mance	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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)
N/A	

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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Huntsville	TX	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Huntsville	TX	(b) (6)		USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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 Cha*** (b) (6) information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I unde subject me to the criminal penalties of 18 U.S.C. 100

Mance Park 02/06/2018

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:

   b. Date wildlife is to be hunted:

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

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):

      Lundu, Musalangu, Zambia
      See coordinates on attached permit

   b. Date wildlife was hunted:

      06/26/2017

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

Skin, floating bones, skull, claws, any parts needed for life-size mount

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]:

4142K Chifwema Road
New Kasama, Lusaka, Zambia

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:	Mike Borman
Business Name:	Bangweulu Taxidermy
Address:	4142K Chifwema Road
Address:	
City:	New Kasama, Lusaka, Zambia
State/Province:	
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.

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: [redacted] Date: 02/06/2018

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):

John J. Jackson III 504/837-1233
jjj@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.

No 12138

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act
(No. 12 of 1998)

Form ZAWA 14

The zambia wildlife
(Licences and fees) Regulations, 2003

RECORD OF GAME OR PROTECTED ANIMALS KILLED OR WOUNDED UNDER NON-RESIDENT HUNTING LICENCE
(Regulation 6)

DETAILS OF PROFESSIONAL HUNTER

Full Name... ANDLIN BAIRD NRC/Passport No (b) (6) [redacted]

Safari Company on behalf of which the Professional hunter is submitting this return: FLYSTONE

DETAILS OF CLIENT

Full Name ... MICHAEL PARK NRC/Passport N (b) (6) [redacted]

Postal Address: .....

Non Resident Hunting Licence No. 23680 Date of issue: 24/5/17

Name of Hunting block hunting was conducted LUNDU GMA

Hunting period 17/6/17 to 10/7/17.

Date	Species/Sex	Number Killed	Number wounded	GPS Location	Trophy for Export: Yes	Trophy for Export: No	Foreign currency value charged to client
20/6	HIPPO M	1		11 24 025 032 441 208	✓		
23/6	LEOPARD M	1		11 15 025 032 49 920	✓		
26/6	LION M	1		11 09 101 032 [illegible] 443	✓		
2[illegible]/6	IMPALA M	1		11 25 944 032 [illegible] 428		X	

DETAILS OF TROPHY MEASUREMENT

Species	Length of skin	Length of Tusk	Av. Lenth of Horn
HIPPO		55cm	
LEOPARD		SKULL 24 x 16 cm	
LION		SKULL 26 x 26cm	
IMPALA		43cm	

DETAILS OF PAYMENTS MADE

Type of payment	Currency	Amount
Amount of foreign currency paid by the client directly to the Safari Co. for the services rendered by the Co. including overheads & Extras		
Amt of foreign currency paid by the Saf Co. On behalf of the client to the DC for Licences and Hunting rights		
Total Amount Paid		

Verification by (a) Client: I certify that the animals listed on this return were hunted by me during the period stated and the total amount of foreign currency stated and paid by me to the Safari Company is the full amount I was charged

(b) Professional Hunter: I certify that the animals listed on this return were actually hunted by the client in accordance with the terms & conditions of a Non Residents Hunting Licence & that the foreign currency stated above is the full amt paid by the client to the Com

Date:

Signatures: Client Michael Park

Professional Hunter

Wildlife Police Officer

White copy to the Director General ZAWA
Yellow copy to the Safari Company
Blue copy to be retained by Professional Hunter

Royal Kafue and the Kaindu Natural Resources Trust

By Jim Wojciehowski

The year was 2007. The noise echoing across the water carried a disturbing message.

The mixture of human voices and cattle, coupled with rising smoke from campfires and drying racks, explained the complete lack of wildlife.

PH Andrew Baldry witnessed the spectacle from across the river in the Lunga Luswishi Game Management Area (GMA). He watched a piece of wild Africa rapidly being depleted of its resources with no plan for the future.

The land was owned by the Kaindu community and the title held by a trust – the Kaindu Natural Resources Trust, initially formed by the Danish International Development Agency; but the project floundered when the donors pulled out. The squatters that Baldry observed were not from the community.

Baldry, a fully licensed professional hunter for over 15 years, was very aware of the African adage: "If it pays, it stays." If the local game did not produce a sustained income for the local community, little could be done to stem the poaching and the rapid depletion of the area's wildlife resources.

Andrew made a plan to revive the once flourishing Eden. With the backing of the local community and chief, the concept eventually evolved into Royal Kafue, which would host its first-ever safari in June 2012.

With adequate financial backing, at least for the start-up, Andrew entered into a lease agreement with the community Trust, and instituted anti-poaching patrols by hiring local scouts who would be led by an infamous ex-commercial bush poacher, Green. Who is better suited to outwit a poacher than someone who knows all the tricks of the trade? Green's amazing tracking skills and knowledge of the local habitat also qualified him as head tracker once the safari camp opened for operation.

I first contacted Andrew about hunting together in the Luangwa Valley in 2010. The topic of what would become Royal Kafue came up via e-mail.

Royal Kafue was already in the works, but Andrew felt it would take at least four years for the area to begin to rebound; initially, he didn't want to inject any hunting pressure into the mix. But he was delighted with the rapid returning of game. He knew cats wouldn't return unless ample prey and cover existed.

After allowing the game in the "Kafue Royal" area several years to recover, in 2012 PH Andrew Baldry (L) successfully hunted lion with Jim Wojciehowski (R), generating income from hunting for the Kaindu Natural Resources Trust.

He'd secured a lion and a leopard on quota, plus a limited number of plains game. His assessment of the conditions was totally honest: "Expect game to be difficult to see in June and July. I plan on leaving the majority of the tall grass to give the cats cover."

I sent my money, including a sizable amount to cover trophy fees. It was obvious this start-up was financially taxing with no large financial backers. The many Skype conversations with Andrew gave me a feeling of trust in this man, as well as a drive to be part of this project, myself.

A partnership of need brought together PH Andrew Baldry, my wife Joyce, and me; but the true benefactor of this alliance is the wildlife of Royal Kafue and the community of Kaindu.

By the time we arrived in camp in June 2012, the game had returned in numbers far exceeding the hopes of Andrew and Green. They had prepared the area perfectly by selective burning, interspacing these areas with lush grass cover. Even the once transient buffalo population remained resident for our entire 21-day safari. And with the buffalo came the lion.

We heard lion regularly calling at night, and on the 15th morning in camp, while enjoying coffee in the predawn coolness, we heard them as they moved toward camp. As the light increased, the sound became louder.

We quickly grabbed our rifles and headed down the road on foot to try and intercept the moving chorus. The calls came from a hunting coalition of four mature lions – three males and a female. The group had decimated one of our baits; on their way to water, they were now approaching camp.

The lions hid as we passed on foot. The sound of brush moving behind our group made us turn in time to see two large, heavy-maned mature males and a lioness emerge from cover. The cats deemed us to be insignificant and crossed an open area into the tall grass. A fourth lion revealed himself to be a brute of a male and, with Andrew's challenging grunt, he stopped to evaluate the source of the call.

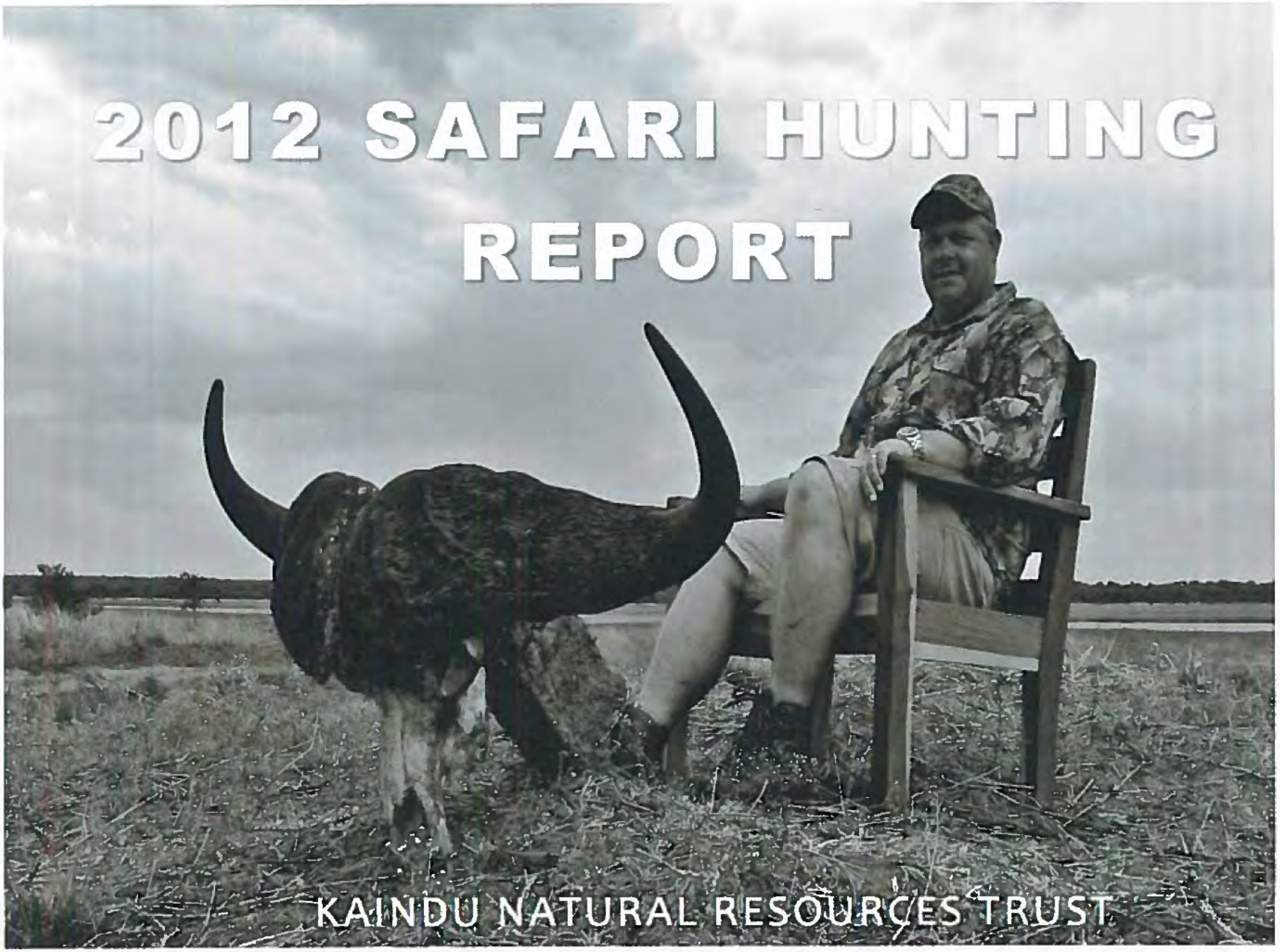
My frontal shot buckled the cat, and he spun to retreat noisily into cover. We found him dead 100 yards on, in deep cover, after a tense side-by-side follow-up on foot.

Luckily, the chairman and treasurer of the Kaindu Trust, Boniface and Joshua, were in camp and able to join the celebration. Later, they privately thanked me for helping to finance the start-up and contributing to its success. I assured them PH Andrew Baldry alone had earned their gratitude for the implementation of his vision.

Two months after the hunt, Andrew told me of his plans to sink boreholes to provide permanent water for the game. He is looking to attract like-minded investors to further the cause of Royal Kafue for the benefit of the game and the people of Kaindu.

Jim Wojciehowski is a physician assistant living in Alaska. An avid hunter/conservationist, he discovered the magic of Africa on his first trip in 2010. This was his third safari.

2012 SAFARI HUNTING REPORT



KAINDU NATURAL RESOURCES TRUST

Natural Resources Manager Green Kabinda

In the first year of safari operation Kaindu Natural Resources Trust in conjunction with the private sector and ZAWA realizes profits from Zambia's first community owned game ranch.

The results from the first year of operation have been unsurpassed in Zambia's game ranching history.

Not only has the Kaindu Game Ranch utilized over 90% of their allocated quota the trophy quality has only been matched by Zambia's prime hunting concessions. The continual support from ZAWA Research Department has to be commended as to the community scouts and Kaindu representatives who have diligently managed their natural resources.

It was recorded in the 2009 survey that only a handful of wild animals survived on the titled KNRT farm 10145 and that most indigenous species were absent. Illegal fishing and poaching was commonplace in the region.

In 2010 the KNRT entertained a partnership with the private sector in wildlife management and the company Royal Kafue Ltd was formed. The Kaindu community retains a significant shareholding in the development company and receives dividends from private sector investments in tourism.

Royal Kafue loaned the community equipment and the human resources in order to conduct safari hunting at an international standard and have attracted clientele from across the globe. The quality of hunting and the abundant wildlife has resulted in advanced bookings for both 2013 and 2014 with and estimated turnover ZK800,000,000 per annum.

From the first hunt alone the community realized a sum of ZK25,000,000, which was dedicated to social services. In addition safari licenses in excess of ZK15,000,000 were purchased and donated to the community for ceremonial purposes.

These communal lands have now become a valuable asset of which sustainable incomes can now be earned from the protection of the wildlife resource.

Green Kabinda.

KNRT NATURAL RESOURCES MANAGER.

The community game ranch saw 100% utilization of quota on trophy Lion, Buffalo, Sable, Roan, Hartebeest, Sitatunga and a host of other lesser species.

Hunting clients stated that it was without doubt one of Zambia's finest hunting destinations. Subsequent favorable reports have been posted on Internet hunting sites and YouTube. Without exception every client harvested their desired species and all of the animals were of record book class.

Two Sable measured in excess of 45 inches and the Lion was the biggest taken in the region in recent years. Two Roan in excess of 26 inches, and Buffalo of 40 inches were commonplace. The renowned professional hunter Andrew Baldry remarked that the hunting was beyond expectations and has managed to fully book his clients into the game ranch for 2013 and 2014.

The increase in wildlife and especially the more sought after species will warrant an increase in quotas across the board. Some species such a Zebra that were previously in low numbers and can be included on the quota. Species such as Elephant and Hippopotamus are now resident and often seen within the vicinity of camp. Important grasslands and woodland have been preserved from fire and logging. Whilst illegal fishing persists it is envisaged that the community will control and profit from this activity as a separate project for 2013.

Sitatunga, Black Lechwe and Tsessebe were also taken in Bangweulu swamps.

The increase in wildlife has reduced the annual livestock conflicts with Lion.

The sale of one successful Lion safari earned sufficient funds to establish the safari camp and infrastructure required for 2012 hunting season. It provided funds that enabled scouts to implement systems that reduced human and wildlife conflicts. Important species such as Lion and other fragile predator populations have increased dramatically under an intensive management program.

A special thank you must be extended to the Natural Resources Scouts who have worked tirelessly in the training in the protective management of their communal lands.

It is the community themselves with the full support of His Royal Highness Chief Kaindu who is to be commended for their desire to realize incomes from both their land sand natural resources.

The cattle killing Lion (see photo bottom right) taken by client first client Jim Wojohowski from Alaska was one of the largest taken in recent years and proves that the community game ranch retains a healthy population of the specie.

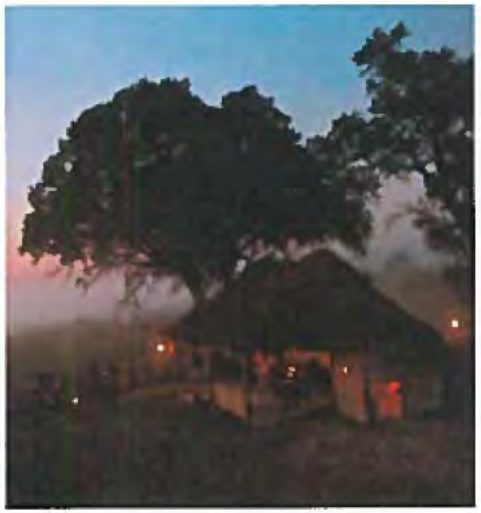
It is envisaged that what with the increase in game populations and that research would conclude that the Lion numbers will follow suit. However as a conservation measure the KNRT feels the game ranch can sustain the off take of one mature male if proven problematic to the community.

KNRT

The Kaindu Natural Resources Trust has pursued this project since 2005. The model was initially supported by DANIDA and CRZ as Kaindu was identified as a Kafue community that did not derive benefit from safari hunting.

In 2010 the opportunity to partner the community was tendered and the successful applicants formed the development company Royal Kafue Ltd of which the community are shareholders. Safari hunting is but the first of a number of tourism activities earmarked for our lands. Profits from managed land use, tourism, game ranching and agriculture are already making a favorable impact on our society.

Our thanks to ZAWA and especially Mr. Siamakonda who has worked tirelessly to see this project launched



ROYAL KAFUE

A permanent 4 bed camp of international standards was constructed and equipped for the 2012 safari season. All staff were employed from the Kaindu community and trained in wildlife management and safari procedures by Mr. Green Kabinda and resident professional hunter Mr. Andrew Baldry.

The development company Royal Kafue Ltd loaned vehicles and auxiliary equipment.

Roads were cut and boundaries cleared. Natural resource management was implemented and staffed. Community scouts were equipped and communications installed courtesy of Mushingashi Conservancy.

The camp and the facilities are to be extended for the 2013 season

2012 CLIENT REFERENCES

JIM WOJOHOWSKI

'well done Kaindu and exceeded expectations'

RICHARD MARTIN

'my best African hunt ever. Well done'

MARK YOUNG

'congratulations to Royal Kafue and KNRT'

FAISAL AL ZAID

'never have I seen so many Sable. 10 out of 10'

TIM CARNEY

'fantastic area and people'

BEVAN JONES

'tops for Buffalo and Roan. Great hunt'

Kaindu Natural Resource Trust chairman Mr. Boniface Chisoshi sitting center with the cattle killing Lion taken on the first safari by clients Mr. Jim and Joyce Wojohowski of Alaska. Natural Resources manager Mr. Green Kabinda is standing on the far right with his hand picked team of community scouts and safari staff.

'Where in Africa can one successfully hunt Lion, Roan, Sable, Sitatunga, Buffalo, Defassa Waterbuck and Hartebeest in one concession? The trophy quality was unbelievable! My congratulations and thanks to the people of Kaindu for the most memorable and wonderful safari ' *Jim Wojohowski. 15 July 2012*

KAINDU NATURAL RESOURCES TRUST

PO BOX 83001 Mumbwa, ZAMBIA.

CHAIRMAN. Tel 0979006461

HRH Chief Kaindu. Tel 0978146874

WESTERN UNION WU

moving money for better

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER - Englewood, Colorado

Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

MONEY ORDER

(b)(6) [redacted]

(b)(6) [redacted]

$ 100.00

PAY EXACTLY ONE HUNDRED DOLLARS AND NO CENTS

PAY TO THE ORDER OF US FWS

PURCHASER'S ADDRESS

PAYMENT FOR ACCT #

(b)(6) [redacted]

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT-76149C

Enhancement Finding
Applicant: Mance (b) (6) Park (PRT-76149C)

Mance (b) (6) Park submitted an application on February 12, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken June 26, 2017, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Park's application involving a *P. l. melanochaita* sport-hunted trophy taken in Musalangu GMA, Lundu, Zambia, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

(i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;

(ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;

(iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;

(iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;

(v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and

(vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

(a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Park's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Park's, participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Park's application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Park's hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Park will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Park, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Park.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Mance (b) (6) Park.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA76149C-0
Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coogliano
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

MANCE (b) (6) PARK
(b) (6)
HUNTSVILLE, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia 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

LB

RCVD FEB 12 2018

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)

RCVD FEB 12 2018

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
McGOVERN	JASON	R.	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tifton	GA	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Tifton	GA	(b) (6)		USA

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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): 01/28/2018

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, Lion
      Panthera Leo, Lioness
   b. Sex (if known).
      1- male
      1- Female

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:

   b. Date wildlife is to be hunted:

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

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):
      South Africa, Reitzedale Game Reserve, Reitzedale Farm 239, Leriesdeel, Northwest, Tosca
   b. Date wildlife was hunted:
      7/28/2016

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

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]:
Republic of South Africa
Moredou Taxidermy, Po Box 323, Schweizer Reneke 2780

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:
Business Name: Logwin Air and Ocean SA (PTY) LTD
Address: 1619 Spartan
Address: Johann Bizkhrat Road
City: Kempton Park
State/Province: Gauteng
Country, Postal Code: South Africa

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: 01-28-18

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):
Jason McGovern, (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lace 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?

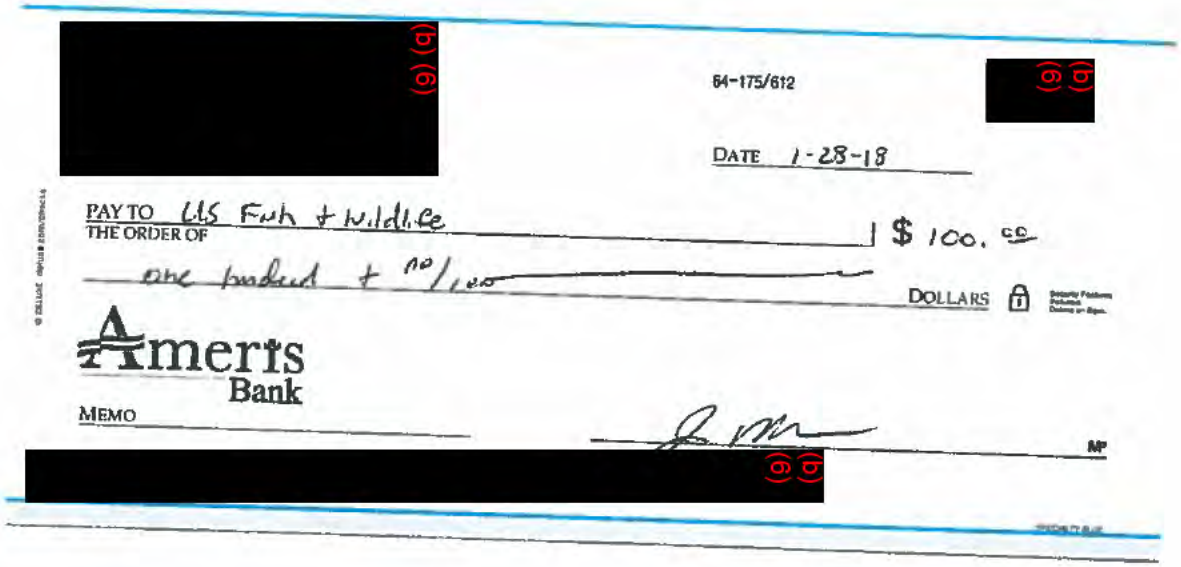
☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

US Fish & Wildlife Service

5) To Answer the question on how hunting will enhance or benefit the wild populations of the species. Its been documented that well regulated and monitored hunting is beneficial to the species And not related to population decline. The species is not in trouble because of sport hunting but threatened by habitat loss, loss of prey, and retribution killings during human-wildlife conflicts. If it wasn't for hunting And the money to support the reserves then the habitat would not exist for the species. It also makes the species have value so all the locals do not kill off the species and hunt them to extinction.

Thank you.

Jason McGovern Application


[redacted] (b) (6)

64-175/612

[redacted] (b) (6)

DATE 1-28-18

PAY TO THE ORDER OF US Fish + Wildlife $ 100.00

one hundred + no/100 DOLLARS

Ameris Bank

MEMO

[redacted] (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD APR 26 2018

LB

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
McAllister	Mark	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			(b) (6)

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Medford	Oregon	(b) (6)		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.

Mark A McAllister 03-20-18

Signature of applicant/Principal Officer 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: 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.

Mark McAlister
(b) (6)
(b) (6)
Medford, Oregon

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

Mark McAlister
(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.

4. 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).

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:
   South Africa, Free State Province, Vredefort is the town.

   b. Date wildlife is to be hunted:
   August 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Brave Heart Safaris
   PH Joe Viljoen

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:

   b. Date wildlife was hunted:

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

Brackenhurst Safaris
PH Joe Viljoen

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]:

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). Hasn't hunted yet but permit is attached.

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: Joe Regal
Business Name: Joe Regal Taxidermy
Address: Farm Thelma
City: Odendaalsrus
State/Province: 9480
Country, Postal Code: Free State, South Africa

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?

No

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?

$27,000 CR No other data

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

No

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: Mark Mich Date: 3-20-18

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).

USFWS Form 3-177
(Revised 03/10)
O.M.B. No. 1018-0012
Expiration Date: 03/31/2013

U.S. FISH AND WILDLIFE SERVICE
DECLARATION FOR IMPORTATION OR EXPORTATION OF FISH OR WILDLIFE

1. Date of Import/Export: (mm/dd/yyyy)

2. Import/Export License Number:

3. Indicate One: ☒ Import ☐ Export

4. Port of Clearance: Portland, ME

5. Purpose Code: _____

6. Customs Document Number (s)

7. Name of Carrier:

8. Air Waybill or Bill of Lading Number:
Master:
House:

9. Transportation Code: _____
License # _____ State or Province _____

10. Bonded Location for Inspection:

11. Number of Cartons Containing Wildlife:

12. Markings on Cartons Containing Wildlife:

13a. (Indicate One) (Complete name/U.S. address/telephone number/e-mail address)
☒ U.S. Importer
☐ U.S. Exporter
Mark A. McAllister
(b) (6)
[redacted]

13b. Identifier Number: _____ ID Type: _____

14a. (Indicate One) (Complete name/foreign address/telephone number/e-mail address)
☒ Foreign Importer
☐ Foreign Exporter
Joe Regel Taxidermy
Farm Thelma
Odendaalsrus 9480
Free State, South Africa

14b. Country Code ____

14c. Identifier Number: _____ ID Type: _____

15a. Customs Broker, Shipping Agent or Freight Forwarder:
(Complete business name/address/telephone and fax number/e-mail address)

15b. Identifier Number: _____ ID Type: _____

15c. Contact Name: _____

Species Code (Official Use Only)	16a. Scientific Name / 16b. Common Name	17a. Foreign CITES Permit Number / 17b. U.S. CITES Permit Number	18a. Description Code / 18b. Source Code	19a. Quantity/Unit / 19b. Total Monetary Value	20. Country of Species Origin Code (ISO Code)	21. Venomous Live Wildlife Indicator ☑ (Check if yes)
	Panthera Leo melanochaita African Lion					☐
						☐
						☐
						☐

Knowingly making a false statement in a Declaration for Importation or Exportation of Fish or Wildlife may subject the declarant to the penalty provided by 18 U.S.C. 1001 and 16 U.S.C. 3372(d)

22. I certify under penalty of perjury that the information furnished is true and correct.

Signature _____ Date _____

Mark A. McAllister
Type or Print Name

For Official Use Only
Action/Comments:

(b) (6), (b) (7)(C)
[redacted]

See Reverse Side of this Form for Privacy Act Notice

OFFICIAL PERMIT

ZASTRON STREET
GRICULTURAL BUILDING
IORD FLOOR
LOEMFONTEIN, 9300
REE STATE
OUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26
FAX: +27 (0) 51 400 9523

destea
department of
economic, small business develop
tourism and environmental affair
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

NUMBER	(b) (6)	
AME	Mark Alan MC Alister	
HYSICAL DDRESS	(b) (6)	Box 169
	USA	Vredefort
		9595

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969). AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO;

Hunt following species on the farm Doornpoort, Vredefort.

Species Name	Scientific Name	Total
Lions 900032002299158	Panthera leo	1

PERMIT HOLDER'S SIGNATURE

APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS

EXPIRY DATE	PERMIT NUMBER	DATE ISSUED
30 July 2018	NC.8025/2018	2018/04/13
RETURN PERMIT AFTER EXPIRY		

Department of Economic & Small Business Development Tourism & Environmental Affairs
13 APR 2018
Private bag X 20801
Bloemfontein 9300
Free State Province

(b) (6) [redacted]

(b) (6) [redacted]

4-24-18
Date

Pay to the Order of U.S. Fish & Wildlife Service $ 100 00

One hundred Dollars

UMPQUA BANK 1-866-4UMPQUA (1-866-486-7782)

For Loan Permit Processing Fee

(b) (6) [redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD MAR 27 2019

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
OLIVER	ROBERT	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			(b) (6)

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 Rural Route # or P.O. Box#)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
TERREBONNE	OR	(b) (6)		USA
2.a. Mailing address (include if different than physical address, include name of co				
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)

(b) (6)

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.

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

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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LOXODONTA AFRICANA

   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, NGAMO/SIKUMI FOREST, VICTORIA FALLS

   b. Date wildlife is to be hunted:
   23 SEPTEMBER — 07 OCTOBER, 2018

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

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:

   b. Date wildlife was hunted:

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

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]:

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). I DO NOT CURRENTLY HAVE PERMITS IN HAND. BEING APPLIED FOR BY MARTIN PIETERS SAFARIS
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:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

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?
   REFER TO LETTER FROM HON. E.D. MNANGAGWA, PRES ZIMBABWE TO PRESIDENT TRUMP DATED 6 DECEMBER 2017

   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?
   SEE ENCLOSED CONTRACT FOR PIETERS WITH THIS INFORMATION

   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
   PART OF THE FEES PAID ARE USED:
   1. FOR FUNDING TO ASSIST ANIMAL CONSERVATION
   2. FOR ANTI POACHING EFFORTS
   3. COMMUNITY IMPROVEMENT
   4. MOST OF THE ANIMAL WILL BE DISTRIBUTED TO LOCAL FOLK FOR FOOD

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: _____ Date: MARCH 22, 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).

President
State House
Harare
Zimbabwe

6 December 2017

His Excellency, Mr Donald Trump
President of the United States of America
1600 Pennsylvania Ave.
Washington, D.C. 20 006

RE: CONSERVATION OF ZIMBABWE'S ELEPHANT

On behalf of the people and Government of Zimbabwe, and indeed on my own behalf, I write to express profound appreciation for the US Fish and Wildlife Service determination that Zimbabwe's elephant conservation programme warrants the issuance of import permits in the United States of America after nearly three years. The conservation of elephant and other wildlife species in Zimbabwe is based on sustainable use and approach, much like the user-pay system in North America or the North American Model of Conservation. It is imperative that American safari hunters be permitted to bring their trophies home for the success of our conservation programme

Your Excellency, Zimbabwe has the second largest elephant population in Africa and the most up-to-date national elephant action plan which includes four regional plans. We need the participation of American hunters for revenues needed for management and to better control poaching. Importantly, our rural communities working with our Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) programme need the support and incentives as well. Elephants will only survive in the long term if they are more valuable to people than their damage to alternative forms of land use, such as subsistence farming.

Furthermore, without a way of benefitting from the elephants, they are regarded as a liability and economic cost to poor rural communities, who suffer crop losses, other damages and loss of human life. Consequently, the

most effective strategy to prevent this displacement is to integrate elephants into rural economies as assets and to demonstrate that elephants contribute to the welfare and development of people. The involvement and empowerment of rural people in natural resources management, in combination with economic and financial incentives through sustainable use, capacity building and skills development, have been driving forces behind changes in attitudes towards wildlife on communally owned land in Zimbabwe.

Your Excellency, I wish to assure you that under my Presidency, the successful elephant programme will continue, including the implementation of the National Elephant Action Plan. Our country is politically stable, and we had a smooth transition from the previous administration, following my inauguration and swearing in as President and Commander-in-Chief of the Zimbabwe Defence Forces on 24 November 2017. All noble conservation initiatives being championed by Zimbabwe will not be reversed but enhanced. The Minister, Permanent Secretary and Director General are confirmed to remain in place.

Going forward, I do hope to improve communications and cooperation between your great country and Zimbabwe, in general, and particularly with the U.S. Fish and Wildlife Service, with the aim of strengthening our partnership in wildlife conservation, rural development and related spheres for an improved quality of life for our people.

Please accept, Your Excellency, the assurances of my highest consideration.

Hon. E.D. Mnangagwa
President of the Republic of Zimbabwe

cc e-mail to Secretary Ryan Zinke and Greg Sheehan - USFWS

MARTIN PIETERS SAFARIS

AGREEMENT

Agreement Between Martin Pieters Safaris and

Client Name: BOB OLIVER
Client Address: (b) (6) [redacted] Terrebonne, OR (b) (6) [redacted] USA
Location of Hunt: NGAMO/SIKUMI FOREST, ZIMBABWE
Date of Arrival: 22 EPTEMBER 2018 Travel Day to Camp
Date of Departure: 08 October 2018 Travel Day to Vic Falls
Location hunt starts: VICTORIA FALLS 23 September 2018
Location hunt ends: VICTORIA FALLS 07 October 2018
Number of hunting clients per Professional Hunter: 1
Number of non-hunting clients: N/A

Martin Pieters safaris will provide the following services & assumes responsibility for:

1. Suitable hunting concession.
2. All hunting camp accommodation, meals, soft drinks, bottled water & services of catering, laundry and camp staff for your use.
3. Provision of alcoholic beverages in moderation.
4. All hunting facilities and staff including a fully qualified PH. tracker(s) & skinner(s)
5. Fully equipped 4x4 hunting vehicle & driver.
6. Payment of conservation fees, concession fees ,all relevant hunting permits, firearm import permits on behalf of the client(s)
7. All field preparation of trophies, dip/ pack , Government trophy export, documentation and delivery of such to our local shipping agent.
8. A suitably knowledgeable person to facilitate customs procedures and firearm import on arrival & departure.
9. Booking of all charter flight services
10. Hotel reservations prior to & after hunt as required .
11. Arrangement of all airport/hotel and airstrip/camp transfers .

The Client takes full responsibility for:

1. International & domestic scheduled flight costs and reservations.
2. Hotel accommodation/transfer costs prior to & after hunt.
3. Payment of hunt cost–in full prior to departure.
4. Payment of air charter costs–in full prior to departure.
5. Payment of firearm import permit fees (if applicable)–in full prior to departure.

6. Payment of all trophy fees one very additional animal taken or wounded &lost, before departure from camp at conclusion of hunt, in US$ cash or pre arranged wire transfer.
7. Payment of all taxes for daily rates and trophy fees as per the Zimbabwe government stipulations.
8. Optional payment of staff & PH gratuities and any other personal expenses.
9. Payment for all trophy shipping & documentation from Zimbabwe and or taxidermy work, if applicable.
10. Visa fees & international airport departure fees
11. Ammunition tax imposed by Customs, as necessary

Hunt Costs:

15 DAYS @ $ 2500/ day Hunt begins 23 September through 07 October 2018

Extras

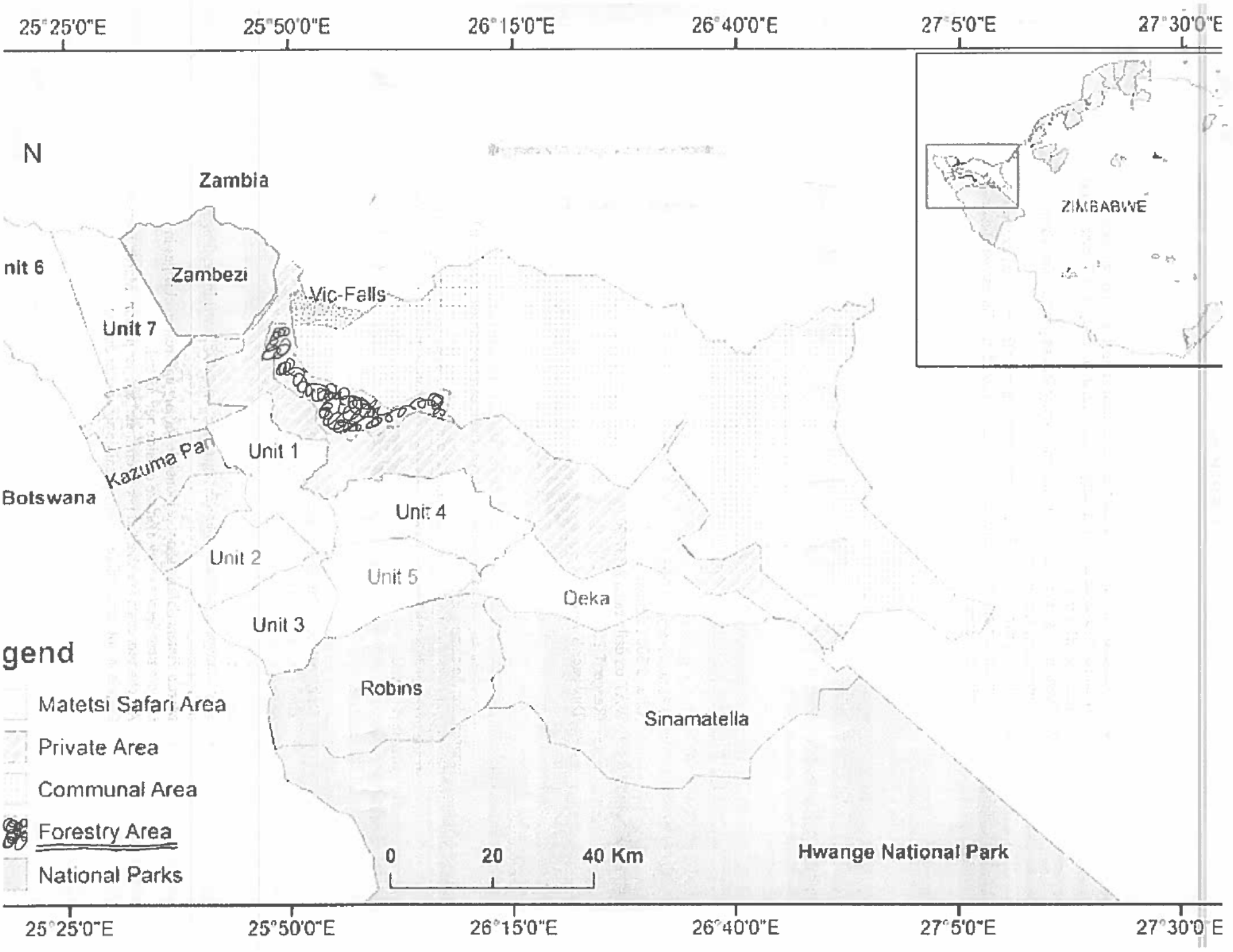
- Trophy fee elephant $ 22 500
- Plains game as per 2018 listed Ngamo rates.
- 4 % tax on trophy fees
- Cites $ 300 (elephant)
- VAT on daily rates $ 337.50
- Ranger $ 1170
- Dip/ pack $ 750

Cancellation Policy

In the event of the cancellation of the hunt by the Client, any deposit will not be refundable under any circumstances. However dates can be changed by mutual consent for the same year.
In the event of cancellation of the hunt by Martin Pieters Safaris, all efforts will be made to reschedule the hunt to the convenience of the client. Failing that, all monies will be refunded.

Please Note:

- Only mature males of the species listed above may be hunted.
- The client(s) takes full responsibility for all animals he shoots, whether killed or wounded & lost and thus is responsible for any penalty imposed by the Game Department should there be an infringement of the Game Laws, by accident or intent
- Any changes or alterations to this Agreement must be in writing and signed by both parties.
- Martin Pieters Safaris is not responsible for any unforeseen changes in Government fees/taxes, which are outside our control.
- Air charters costs are charged per aircraft and not per person. Martin Pieters Safaris is not responsible for any possible air charter delays.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Unit 7
Unit 1
Kazuma Pan
Botswana
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Unit 2
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Communal Area
Forestry Area
National Parks
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Sinamatella
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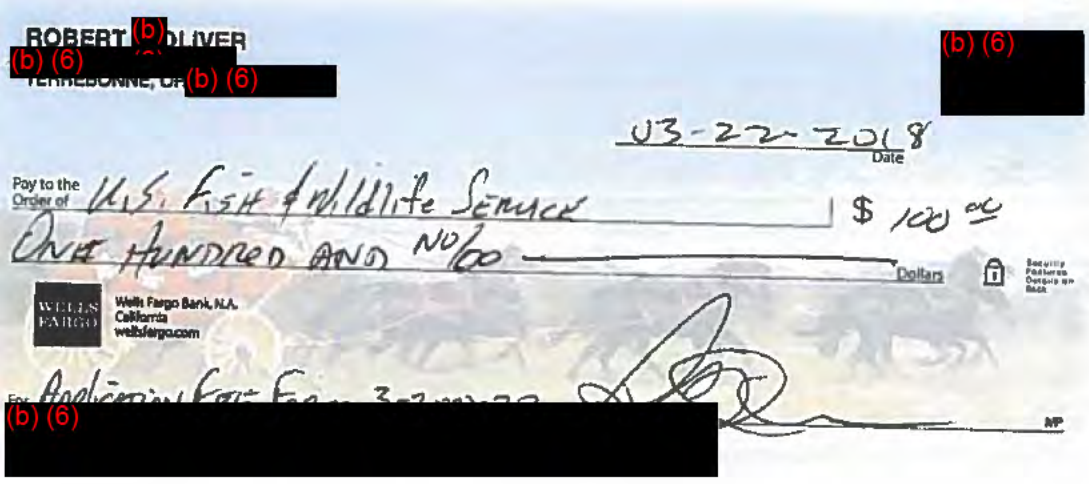

ROBERT (b) OLIVER
(b) (6)
(b) (6)
(b) (6)
03-22-2018
Date
Pay to the Order of U.S. Fish & Wildlife Service
$ 100 00
ONE HUNDRED AND NO/00
Dollars
WELLS FARGO
Wells Fargo Bank, N.A.
California
wellsfargo.com
For Application Fee
(b) (6)
MP

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 FEB 23 2018

LB

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
House	Jason	A.S.	

3. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Reno	NV	(b) (6)		U.S.A.

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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.

Jason A.S. House — 02/08/2018

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

...IPORT 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 (3-200-32, 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.
   African Lion (Panthera Leo) Southern
   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:
   b. Date wildlife is to be hunted:
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
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):
   Riverside Ranch, Victoria Falls, Zimbabwe
   b. Date wildlife was hunted:
   Oct. 2016

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

Skin (life size), Skull

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]:

T.C.I
4 Josiah Chinamano Road
Belmont, Bulawayo, Zimbabwe

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: Marina Burgess
Business Name: Maple Freight
Address: 4 Josiah Chinamano Rd.
Address:
City: Belmont, Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

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: Jason A.S. Hous Date: 02/08/2018

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).

Houston Texas

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):

Jason House
(b) (6) (b) (6)
Reno NV

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.

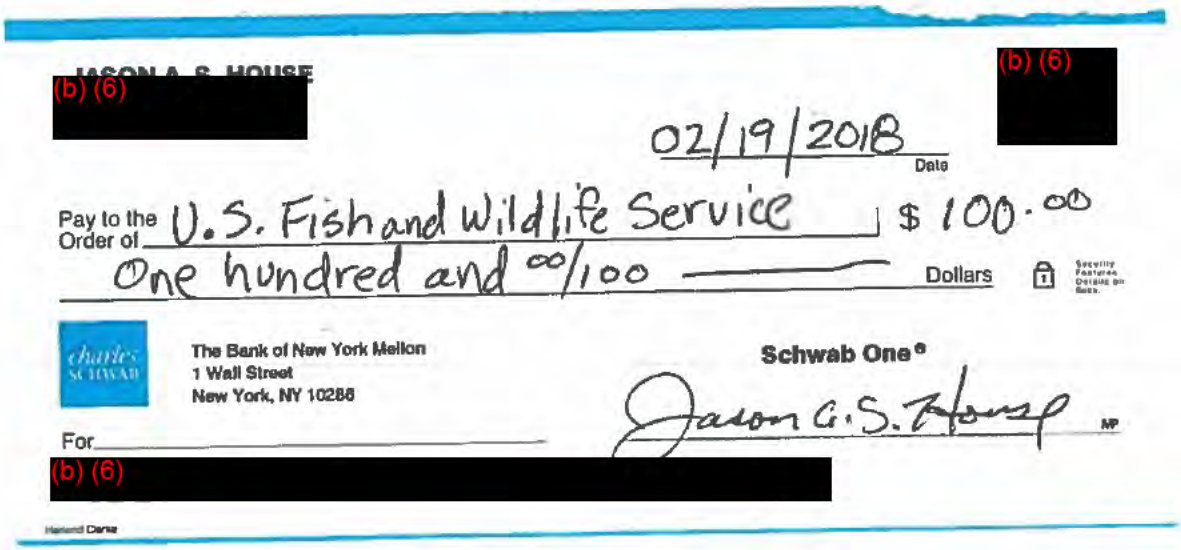
11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Jason House
(b) (6)
(b) (6)

Lynette Lilley
(281) 606 2400
llilley@well-usa.com

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.



JASON A. S. HOUSE
(b) (6)

(b) (6)

02/19/2018
Date

Pay to the Order of U.S. Fish and Wildlife Service $ 100.00

One hundred and 00/100 Dollars

charles SCHWAB

The Bank of New York Mellon
1 Wall Street
New York, NY 10286

Schwab One®

Jason A. S. House

For (b) (6)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/78584C

Enhancement Finding
Applicant: Jason A.S. House (PRT – 78584CC)

Jason A.S. House submitted an application on February 28, 2018, for the importation of one male lion (*Panthera leo melanochaita*) taken from Riverside Ranch, Victoria Falls, Zimbabwe, for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken during October 2016, from this population meets the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt

any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinient to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zinmbabwe.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita,* including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita,* the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.,* that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. House's application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita.* This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. House's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats

that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. House's participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on

February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

Governance of Lions in Zimbabwe: The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the

primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Bubye Valley Conservancy (BVC) alone during 2015 (K. Leathem, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

Current Lion Status in Zimbabwe: When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to lose of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez et al. 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez et al. 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km^2 of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km^2), with the majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km^2 and lions occur in 36% of these areas. Lions are transient in

CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015.

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km^2 of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bubye) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km^2 is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region.

Lion Management in Zimbabwe: In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13th Meeting of the Conference of the Parties (CoP13), and

subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, "human-lion related conflicts minimized and, where possible, eliminated" has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; Identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid

response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, "the costs and benefits of long-term lion management equitably distributed," is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders." The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets.

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006) borrows language from the *IUCN SSC Conservation Strategy* (2006). It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented

within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the "Long Shields Guardian Programme" was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the "Long Shields." These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

Hunting and Utilization: Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km^2 of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological

perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of $0.3 \pm 0.1/100$ km^2 for female lions; during the same period, actual offtake was lower at $0.08 \pm 0.1/100$ km^2, or a mean of 30.6 percent of the quota actually harvested (Loveridge *et al.* 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place.

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016).

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According ZWPMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016

report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km^2; the 2015 offtake would have accounted for 0.125 lions/1,000 km^2.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (Du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the Strategy and Action Plan, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): <u>The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit</u>:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez et al. 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez et al. 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez et al. 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable

population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

Conclusion

Given the status of lions within Zimbabwe at the time Mr. House conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. House's sport-hunted trophy taken in Zimbabwe during October 2016, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will

need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. House conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Jason A.S. House of Reno, Nevada.**

Anne Barry 6/9/18

Anne Barry, Acting Team Leader
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/2018

Mary Cogliano, Chief
Branch of Permits
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LION ZIMBABWE ESA TROPHY

Permit Number: MA78584C-0

Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

JASON A.S. HOUSE
(b) (6)
RENO, NV (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zimbabwe 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 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.

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.

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).

RCVD FEB 23 2018

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: Steven J Dupuis

Date: 02/21/18

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
(Appendix I of CITES and/or ESA)

RCUD FEB 28 2018

LP

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Dupuis	Steven	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a (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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Lafayette	La.	(b) (6)		U.S.A.

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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Unavailable 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): 02/21/18

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: South Luangwa, Zambia in Nyamvu and West Petauke game management area's, Nyimba being the closest Town Operator and Lease holders Nyamvu and Mopane Safaris
   b. Date wildlife is to be hunted:
   May 7TH 2018 Thru May 28TH 2018
   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: Bridge Shipping Zambia Limited
Business Name: Villa Park, Plot 177/178 Unit C3
Address: Luanshya, Road,
Address:
City: Lusaka, Zambia.
State/Province:
Country, Postal Code: Zambia, 10101

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: 02/21/18

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):

Same as page 1

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 Jackson III, Conservation Force, 504-837-1233 jj-No2@att.net or Regina Lennox of Conservation Force Regina.Lennox@conservationf

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.

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER. IF COPIED THE WORD "VOID" WILL ALSO APPEAR.

(b) (6)

Capital One Bank

84-487
1111

CASHIER'S CHECK

DATE 02/22/2018

ISSUING REGION 081 BRANCH W. Congress BRANCH DID 41243

NE HUNDRED DOLLARS AND 00 CENTS

AY TO THE RDER OF ***US FISH & WILDLIFE SERVICE***

$ 100.00

Drawer: Capital One, N.A.

AUTHORIZED SIGNATURE

RE: STEVEN DUPUIS

Read the reverse side for important information on the reissuance of lost, destroyed, or stolen cashier's check.

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

(b) (6)

Barry , Anna <anna_barry@fws.gov>

Steven Dupuis PRT #78597C

Steve Dupuis (b) (6) Wed, Apr 11, 2018 at 5:52 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Thank you very much Anna, I understand the process. Please keep me informed of any changes and if I can do anything on my end. Steve

[Quoted text hidden]

United States Department of the Interior

FISH AND WILDLIFE SERVICE
International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

June 8, 2018

In Reply Refer To:
FWS/AIA/DMA/PRT- 78597C

Enhancement Finding
Applicant: Steven (b) (6) Dupuis (PRT- 78597C)

Steven (b) (6) Dupuis submitted an application on February 28, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Lusaka, Zambia for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the government of Zambia, other information available to the Service, and comments received from interested parties, the U.S. Fish & Wildlife Service (Service) has determined that the importation of the sport-hunted trophy taken May 7, 2018 through May 28, 2018, from this wild lion (*P. l. melanochaita*) population within Zambia **meets** the enhancement criteria under 50 CFR 17.32.

Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472.) On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r). 80 Fed. Reg. 79999. The effective date of this listing was January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zambia, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the

applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zambia, but only if it first makes a finding that permitting import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P. l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P. l. melanochaita* taken in Zambia.

General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)], but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import of a sport-hunted lion trophy taken in Zambia contributes to the overall conservation of the species

by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provide a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Dupuis' application involving a *P. l. melanochaita* sport-hunted trophy taken in Zambia's West Petauk GMA, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [(50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

> (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
>
> (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
>
> (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
>
> (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
>
> (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
>
> (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making this enhancement finding for the importation of a sport-hunted trophy of *P. l. melanochaita* from Lusaka, Zambia. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service in making this enhancement finding for importation of a sport-hunted trophy of *P. l. melanochaita:*

> (a) *Biological sustainability:* The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities.

The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

(b) *Net Conservation Benefit:* The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

(c) *Socio-Economic-Cultural Benefit:* A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

(d) *Adaptive Management: Planning, Monitoring, and Reporting:* Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (*e.g.*, population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

(e) *Accountable and Effective Governance:* A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of a sport-hunted trophy of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentive*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities, thus encouraging community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Dupuis' trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zambia's's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether this trophy taken as part of that program meets the issuance criteria, we study a number of factors. Some of the factors we considered include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. Several components of a management plan from which trophy imports could meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities, and incentives provided to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria at 50 CFR 17.32(a)(2), we examined if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how the U.S. hunter's, in this case, Mr. Dupuis', participation in the hunting program contributes to the overall management of lions within the country.

The management program in Zambia for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

Basis for Finding:

On February 2, 2016, the Service sent a letter to Zambia's Wildlife Authority with a list of questions that would aid the Service in evaluating the overall conservation and management of the subspecies, *P. l. melanochaita*, in Zambia and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0 (*IUCN SSC 2012*)*, as it provides useful principles, which when

considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement findings for permitting importation of sport-hunted lion trophies.

In response to our February 2, 2016, letter, Zambia's Department of National Parks and Wildlife (DNPA), herein referred to as DNPW (DNPW 2016), provided a binder of documentation describing Zambia's lion population and management plans. In addition, the Service met with representatives of Zambia's DNPW during the 17th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Johannesburg in late September 2016. The DNPW binder documents, dated May 5, 2017, along with the Service's final rule on the lion listing under the Act, relevant information obtained separately through open sources such as IUCN documents, relevant information from DNPW, comments received from interested parties, and Mr. Dupuis' application were the basis of this finding.

Governance of Lions in Zambia:

The responsibility for implementing wildlife conservation laws in Zambia dates back to the 1930s or 1940s with the establishment of the Department of Tsetse, Fisheries, and Wildlife. In the late 1950s, this agency became the Department of Game and Fisheries and operated under this designation until the mid-1970s, when it became the Department of National Parks Wildlife Service (DNPWS) who was responsible for the protected area network. In 1999, the Government of Zambia transformed this agency into Zambia's Wildlife Authority (ZAWA), creating a semi-autonomous agency responsible for the management and protection of this network, with statutory powers derived through the Zambia Wildlife Act No. 12 of 1998. However, this agency, due partly to its semi-autonomy, had a low funding capability, relying primarily on revenue from tourism, which also included sport hunting. Between 1999 and 2005, ZAWA struggled with their law enforcement capabilities due to inadequate resources. The costs associated with transforming DNPWS to ZAWA continued to affect the financial and staff allocations for law enforcement activities. Large sums of money that could have been utilized by law enforcement were apparently channeled into tasks involved in the transformation process.

Since 2005, in partnership with the Zambia Lion Project (ZLP), ZAWA (now DNPW) established a voluntary program to assess and age lions taken as trophies (DNPW 2016). From 2006 through 2012, DNA samples were taken from teeth of both live and trophy lions in order to estimate the age of lions taken as trophies (DNPW 2016). The results from these past sampling efforts helped demonstrate the performance of the hunting sector during this time. It has also provided a baseline for comparing future performance.

By 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the approval of this strategy, research has begun and management actions have been taken to address local community benefits, human-lion conflict, land use planning and zoning, trade, and monitoring (DNPW 2016). Some of the lion-related studies that were initiated are the Zambia Carnivore Programme (ZCP), Kafue Lion Project, and Zambia Lion Project (ZLP) (DNPW, 2106). The development of this strategy also led to the employment of 12 ecologists, with three committed to spending 70% of their work time on lion-related issues (DNPW 2016).

In 2015, ZAWA was disbanded and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). In addition, the Zambia Wildlife Act No. 12 of 1998 was

repealed. However, the Wildlife Act No. 14 of 2015 (Wildlife Act) is still the principle legislation guiding the management of wildlife in Zambia through a system implemented and enforced by DNPW with assistance from stakeholders (DNPW 2016).

The Wildlife Act is administered by DNPW under the Ministry of Tourism. DNPW is headed by a Director, with assistant directors who command 4 elements of the department: Principal Warden-Operations Wildlife Law Enforcement Unit, Principal Warden-Conservation Unit, Principal Engineer Infrastructure Development Unit, and Principal Natural Resource Management Officer Community-based Natural Resource Management Unit. *The Wildlife Law Enforcement Unit* is comprised of 1,250 Wildlife Police Officers who are responsible for investigating and enforcing wildlife crimes within 236,376 km^2 of wildlife area (average 189 km^2 per officer). The Zambian government has also committed to adding an additional 850 officers by 2018 (600 new officers were reportedly added in 2016). *The Wildlife Conservation Unit* is responsible for mitigating human-wildlife conflict, facilitating wildlife officer trainings, regulating private wildlife estate operations, managing ecosystems, managing landscape conservation of certain species, and both developing and implementing park regulations. *The Infrastructure Development Unit* is responsible for construction and maintenance of infrastructures and machinery within protected areas. *The Community-based Natural Resource Management Unit* is responsible for co-managing Game Management Areas (GMAs) with local communities. Duties include providing technical support to Community Resource Boards regarding the management of human-natural resources in GMAs and open areas. This unit facilitates the election of the Community Resources Board members and the election of Village Action Groups. Responsibilities also include monitoring the use of funds disbursed to Community Resources Boards and training village scouts and Community Resources Board members.

The lion is a protected species under the Wildlife Act. It is a criminal offense to hunt, kill, capture, or possess a lion without a license. The lion is also protected under private wildlife estate legislation and statutory instruments implemented with the (now repealed) Wildlife Act of 1998 and carried over to the Wildlife Act. Additionally, in 2016, four new statutory regulations were reportedly enacted to address various aspects of lion management to complement the operation of the new Wildlife Act. They included the Zambia wildlife regulations for granting of hunting concessions, lion sport hunting, keeping of big cats in captivity, and conducting ecological or research wildlife assessments (DNPW 2016).

In addition to Zambia's domestic laws, it is also a Party CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including findings from the exporting country's CITES Management Authority that the specimen was legally acquired and the country's Scientific Authority that the export will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zambia provided a copy of their May 5, 2016, non-detriment finding for lions. This finding states that "(t)he CITES Scientific authority of Zambia has considered the population of lion in Zambia; the quota-setting system and current precautionary quota of only 24 lions; the newly implemented age-based harvest policy; the limited offtake; the adaptive management of lion; and the substantial revenues generated for DNPW operations, anti-poaching, and community development." They further explain that their positive finding was based on three pillars that include a "precautionary" quota, age-based harvesting, and community benefits.

Current Lion Status in Zambia

Lion Range:

According to DNPW, the lion range in Zambia covers about 63% of Zambia's protected areas, which is about 145,000 km^2 (DNPW 2016). Historically, lions occurred in the West Lunga complex, although, recently, populations have not been found in this complex (DNPW 2016). The majority of lions are found in three main clusters throughout Kafue, Luangwa, and the Lower Zambezi region. Luangwa and Lower Zambezi are connected through GMAs. Smaller populations of lions are also present in Liuwa Plains, Sioma Ngwezi, Nsumbus, and the Lavushi Manda National Parks. In addition, Kazungula and Siavonga open areas have lion populations that roam between Zambia and other countries (DNPW 2016).

The 2016 IUCN Red List Assessment stated that lions are now extinct in 15 countries in Africa (including Western Sahara, which is technically a disputed territory), are possibly extinct in another seven countries, and now occur in only 24 countries (Macdonald 2016). The latest IUCN estimates suggest a population of 23,000 - 39,000 lions throughout their current range on the African continent (IUCN 2016), representing a decline of at least 43% between 1993 and 2014. Lions are now considered to have been extirpated from at least 92% of their historic range (Macdonald 2016). Therefore, in assessing the population of lions in Zambia, we must also consider the significance of the diminishing total population of lions remaining in the wild. This is in part because the southern and eastern African lion populations include Zambia (DNPW 2016). DNPW presented a study conducted by the Zambia Lion project (ZLP) in which DNA analysis of Zambian lions was undertaken during 2004 - 2012. The study concluded that southern African and eastern African lions were integrated among the Zambian lions. The study also determined that the genetic diversity of Zambian lions is much greater than comparable areas in southern and eastern Africa.

Population Status:

Data provided by Macdonald (2016) indicate that Zambia contains approximately 1,200 free-ranging lions in an estimated range of 135,000 km^2 (approximately 10,000 km^2 less range than identified by the Zambian government). DNPW explains that previous lion estimates were determined, in large part, through expert opinion (DNPW 2016). They also confirm that no intensive research has been conducted in the corridor area, consisting of West Petauke, Chisomo and Luano GMAs, and surrounding Open Areas (DNPW 2016).

In addition to the population status determined by Macdonald (2016), the Zambian Carnivore Programme (ZCP) studied the population of lions in Zambia. In 2013, the ZCP monitored 13 prides and 13 coalitions, comprised of 141 lions with 3 adjacent sites of 20 lions each, totaling over 200 lions. In 2014, the ZCP monitored 15 prides and 13 coalitions, with a total of 166 individual lions. In 2015, the ZCP's partial data indicated that 15 prides and 15 coalitions of lions exist throughout Zambia.

In acknowledging their need for more complete and current lion population data, DNPW has begun working with partners on monitoring studies in the Luangwa and Kafue ecosystems. Surveys were conducted in the later part of 2016 (DNPW 2016). The Service has not seen the results, but will request them for consideration in future enhancement determinations. In addition, dependent on funding availability, DNPW has identified that a survey would be conducted of the corridor

between South Luangwa National Park and Lower Zambezi National Park and the GMAs surrounding the eastern part of North Luangwa National Park.

A report by the Democratic staff of the House Committee on Natural Resources concludes that Zambia lion populations may show signs of stabilizing or even recovery, but strict controls on additional mortality are necessary to prevent further decline (Grijalva 2016).

Threats:

Habitat Loss, Population Growth, and Human-Lion Conflicts:

Lion populations throughout Africa have decreased in correlation with their habitat. Currently only 10 stable populations with more than 500 lions still exist throughout the continent of Africa (Creel *et al.* 2016). Africa has the fastest human population growth rate in the world, with projections estimating a population tripling across 27 African states by 2100, leading to a continental estimate of 4 billion. Eight lion range states are estimated to have a five-fold increase in human population by 2100 (Macdonald 2016), and Zambia has not steered clear of Africa's population and development growth (DNPW 2016). Human population growth has increased in Mfuwe, the gateway town to South Luangwa National Park, largely due to increased infrastructure development and an increasing number of economic opportunities created through tourist lodges (DNPW 2016). Habitat loss, population growth, human-lion conflicts, poverty, poaching, diseases, uncontrolled hunting, and the importation of captive-bred lions into Zambia are all threats to the long-term survival of lion populations in Zambia.

DNPW stated that human-lion conflicts are not uncommon in Zambia. From the years 2008 through 2015, a total of 327 livestock animals were recorded as being killed by lions; since 2002, at least 70 lions were reported killed as a result of human lion conflicts (DNPW 2016). The number of Zambian lions killed as a result of human-lion conflict is shown in the table below.

Year	Lions Killed
2002	2
2003	4
2004	1
2005	0
2006	5
2007	8
2008	2
2009	5
2010	3
2011	8
2012	5
2013	10
2014	14
2015	1
2016	2

Poverty, Poaching, and Disease:

Prey base depletion is partly linked to habitat loss, but more importantly to poaching and bush meat trade (Becker *et al.* 2013). Poaching of lions for the trade in bones and other body parts for traditional medicine is an emerging threat within Africa (Macdonald 2016). Within Zambia, another more widely occurring threat believed to be facilitated by high levels of poverty is poaching of lions for bush meat (DNPW 2016). DNPW acknowledges that bush meat poaching occurs widely in Zambia (DNPW 2016). They also acknowledge that the amount of illegal use of lion parts in Zambia is currently unknown (DNPW 2016). However, DNPW has indicated it will establish an investigation into the illegal trade and use of lion parts.

Zambia has addressed the need to monitor the health of their lions by creating the Infrastructure Development Unit (IDU). The IDU subsequently established a veterinary unit of DNPW whose responsibility is to regularly sample lion specimens for diseases. This unit also assists law enforcement officers in the treatment of injured lions due to illegal activities such as snaring (DNPW 2016).

Trophy Hunting:

Di Minn *et al.* (2016) estimated that 37.8% of Zambia is covered by terrestrial protected areas, with 21.3% in Open Game Ranches. According to a 2012 article, lion hunting in Africa generates 5–17% of gross trophy hunting income on national levels, with the proportional significance highest in Mozambique, Tanzania, and Zambia (Lindsey *et al.* 2012). A more recent paper published by Macdonald, however, asserted that Zambia generated very little revenue from trophy hunting (Macdonald 2016). It should be noted, however, that Macdonald based the paper on data obtained in the years before 2016 (the moratorium was between 2013 and 2015), and the formation of DNPW and newer regulations were not implemented until after Zambia imposed a moratorium on lion hunting for the years 2013 through 2015. According to DNPW, Zambia's total hunting revenue (all hunting, not just lions) accounted for 32% of the revenue that ZAWA (now DNPW) received during the years 2010 through 2012 (DNPW 2016). They also affirm that the average revenue generated for hunting in Zambia was reduced to 4% during the lion hunting moratorium in 2013 and 2014 (DNPW 2016).

IUCN has only examined the lion population in Luangwa, Zambia. Their findings indicate that trophy hunting in Luangwa contributed to a decline in the lion population by 28% between 1993 and 2014 (Macdonald 2016). However, this assessment was done prior to Zambia's 2013-2015 hunting ban and therefore, it will need to be re-assessed now that Zambia's lion hunting ban has been lifted and new regulations have been implemented.

Importation of Captive-bred lions:

Captive-bred lions from South Africa and Zimbabwe are being imported into Zambia for lion walks (DNPW 2016). DNPW believes that the importation of captive-bred lions is a result of a growing photo-tourism market in the Livingstone area of southern Zambia (DNPW 2016). Since 2008, a total of 54 captive-bred lions have been imported into Zambia, but the Zambian government has imposed a condition that the captive-bred lions will not be introduced into the wild (DNPW 2016).

In order to ensure that Zambia's captive-bred lions do not negatively impact their wild lion populations, Zambia is currently working on the preparation of a statutory instrument that will regulate the importation and captive uses of lions. Other than for temporary veterinary purposes, the holding of, breeding, and commercial use (i.e. walking and petting) of captive-bred lions will be banned (DNPW 2016). Lions that are currently held in captivity will be required to be castrated or spayed, and eventually all commercial uses of captive-held lions will be phased out (DNPW 2016). DNPW states that "particular care will be taken to avoid the dumping of captive-held cats into wild areas for any reason, especially for hunting or 'release' as means for the owners to avoid the penalties or costs associated with the authorized disposition of their animals (DNPW 2016)."

Partners/Non-governmental Organizations (NGOs):

DNPW has partnered with several NGOs in an effort to obtain lion population survey data and to conduct other lion-related research studies. The Zambia Lion Project (ZLP) has conducted research on the presence/absence of lion surveys throughout Zambia (DNPW 2016). They have also assisted with DNA collection studies. The Zambia Carnivore programme (ZCP) has been documenting population trends and demographic vital rates of lions in the key areas of South Luangwa National Park, Kafue National Park, and Liuwa Plain National Park. Through their research efforts, the ZCP has also contributed to aerial support that has assisted DNPW with enforcement actions.

Although their research focus has been on elephants, the Frankfurt Zoological Society has been active in North Luangwa ecosystem for over 20 years. Conservation South Luangwa (CLS) has been active in South Luangwa National Park and surrounding GMAs. Game Rangers International has been active in the Kafue ecosystem since 2010. Conservation Lower Zambezi (CLZ) is also active in the Lower Zambezi national park and surrounding GMAs.

Supplemental revenue sources are also gained with the support of several NGOs. NGOs can provide functions that include anti-poaching units and/or aerial support. One such example is the Frankfurt Zoological Society (FZS), which has been active in North Luangwa National Park for over 20 years. FZS established a partnership with DNPW in order to help preserve black rhino and elephant populations through the establishment of The North Luangwa Conservation Programme (NLCP).

Lion Management in Zambia

History of Lion trophy exports:

During 2008 - 2012, DNPW authorized the export of 289 lion trophies (50, 40, 89, 37, and 73 respectfully). During 2013 - 2015, the Zambian government established a lion hunting moratorium (some trophies apparently taken before the moratorium were exported during this time, however). The moratorium was established to allow time to restructure Zambia's governance of lions and to allow a period of time for lion recovery (DNPW 2016). Data comparing the lion population status before and after the moratorium are currently unavailable; hence, the success of the moratorium cannot be fully assessed.

Lion Hunting and Concessions:

Zambia lion hunting occurs in *Game Management Areas (GMAs)* and *Open Game Ranches (OGRs)*. OGRs are unfenced private lands reserved for the wildlife conservation management of an

individual or local community. They are buffered by GMAs. DNPW issues annual non-resident hunting quotas to the OGRs in exchange for managing the wildlife; although all animals remain the property of the State (DNPW 2016).

All 20 of Zambia's national parks are surrounded by GMAs, but currently, lion hunting only occurs within hunting blocks located in the GMAs that surround the National parks in the Luangwa, Kafue, and Lower Zambezi ecosystems. GMAs are primarily designated for safari (tourist) and resident hunting, but some GMAs also include photographic tourism. All GMAs allow settlement. There are 36 GMAs in Zambia covering 177,404 km^2 (DNPW 2016). Most, but not all, GMAs have General Management Plans outlining basic management practices. Community-Based Natural Resource Management (CBNRM) is implemented within GMAs through Community Resource Boards (CRBs) (DNPW 2016). The CRBs focus on the economic and social well-being of local communities. There are currently 75 registered CRBs within Zambia that employ approximately 750 community scouts and 79 support staff.

DNPW, in consultation with the local community, is mandated to grant hunting concessions within specific hunting blocks within GMAs. Hunting concessions must be registered in Zambia, have a tourism enterprise license, have a valid tax clearance certificate, provide proof that the company is not bankrupt, and they must meet any additional conditions set by an evaluation committee (DNPW 2016). Leases are stated to range from 7 - 15 years, with the length of lease time dependent on the abundance of species classified within the individual hunting block (DNPW 2016). Prime hunting blocks have greater species abundance and are generally awarded shorter lease agreements in comparison to secondary hunting blocks. Secondary hunting blocks are generally given longer lease periods in an effort to provide incentives for the concessionaire to invest greater resources, allowing wildlife populations to increase before offering hunting (DNPW 2016).

Hunting block concessions are awarded through a bid process in accordance with the Zambia Public Procurement Act No 12 of 2008. Bids are taken from companies through a "two envelop system." The bids consist of a technical proposal and a financial proposal being placed in separate clearly marked envelopes. The technical bid is required to be evaluated by criteria outlined in Zambia's Wildlife Act before the envelope containing the financial bid is opened. Financial envelopes will only be opened for bidders that meet a specific technical expertise (e.g., a score of over 80 on the established criteria). The lease is awarded to the bidder that qualified with a minimum technical rating of 80 and whom submitted the highest financial bid (DNPW 2016).

Successful bidders must address statutory obligations to communities and provide enforcement contributions when developing Concessionary Agreements. Concessionary Agreements are developed through a partnership between the communities, safari operators, professional hunters, and DNPW. As such, a hunting concession agreement is not valid without the signature of the Chief(s) or CRB associated with the hunting block (DNPW 2016). Concessionaires are required to use collected fees to support resource protection by providing community scouts, vehicles, fuel, patrols, and equipment. They must provide infrastructure development to local communities and also offer resource monitoring and fire management. Some concessionaires further benefit community development by supporting the employment of teachers and nurses, purchasing ambulances, building classrooms and clinics, and providing houses for teachers and health personnel. Moreover, they are mandated to provide 50% of the meat from hunted animals to the local community. Concessionaires are evaluated annually and those that do not comply with their

obligations can have their concession terminated before the end of the agreement's term (DNPW 2016).

Hunting Quotas:

From 2005 - 2012, Zambia had quotas that totaled 683 lion in 21 GMAs and 5 OGRs, with the highest annual quota set at 117 lions and the lowest at 55 lions (DNPW 2016). The quotas were generally based on the previous year's lion quotas and, in some cases, the quotas were a fixed part of a concession agreement (DNPW 2016). However, DNPW did not completely identify the basis for these quotas or how they were distributed. Currently, quotas are based primarily on lion populations determined through aerial surveys (DNPW 2016). However, information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring is also used. CRBs use the information they have collected to determine what the GMA quota should be. Their proposal is submitted to DNPW for approval. Once a proposal is received, DNPW accepts feedback from field staff and safari hunting outfitters, as well as the hunting guidelines (below), before the quotas are approved by the Wildlife Conservation and Management Unit and distributed by their Licensing Unit. The quotas are then distributed to the CRBs and hunting companies. DNPW is required to share the approved quotas with other government agencies, including the Auditors General Office and Anti-Corruption Commission. For 2016, Zambia established a quota of one lion per hunting concession, for a total quota of 24 lions (2 hunted on OGRs and 22 hunted in GMAs). Quotas are set for individual hunting blocks within the GMAs.

Hunting Guidelines:

The Zambia's Conservation Strategy and Action Plan for the African lion was developed in 2010 and designed with a 10-year plan (DNPW 2016). The purpose of the plan is to gain stakeholder participation while using adaptive management practices when addressing concerns regarding scientific management, habitat protection, and human-lion conflicts. Based on the principles of the Action Plan, following the three-year moratorium, in 2016, DNPW consulted independent lion experts and held a workshop that resulted in the creation of hunting guidelines (DNPW 2016). The guidelines are considered part of an adaptive process to manage lion hunting in Zambia. DNPW is in the process of transforming the guidelines into a statutory law that will include provisions for monitoring lion hunting through an age-based system (DNPW 2016). The lion hunting guidelines include, but are not limited to, the following recommendations:

1. No hunting of female lions.
2. No hunting of any lion born or held in captivity.
3. No use of pre-recorded sounds in lion hunting.
4. No lion hunting on fenced game ranches.
5. Lions should only be hunted in Prime and Secondary areas and Open Game Ranches known to be rich in lion and prey.
6. Establishment of a place for trophy measurements of hunted lions for exports should be established.
7. DNPW shall establish a lion aging evaluation committee that will include representatives from the Professional Hunters Association, the Safari Operator Association, the Wildlife Producers Association, and officers from DNPW that are nominated by the director. Prior to issuing CITES permits, the committee shall meet once a year to establish the age of hunted lions.

DNPW has established age-based categories that divide lion hunting into four age-based categories: Category 1 consists or male lions between five and six years old and above; Category 2 consists of male lions older than four years old, but younger than five years old; Category 3 consists of male lions that are younger than four years old; and Category 4 consists of male lions seven years old or older. DNPW has determined that only male lions that are five years and older should be hunted. However, DNPW may authorize the export of Category 2 male lions so as not to penalize the hunter. Lions that are less than four years old will be confiscated and may not be exported. In cases where lions under five years old are taken, however, the professional hunter and the safari outfitter may be penalized (Becker 2017 per. comm.).

Wildlife officers must also accompany hunters on all hunts (DNPW 2016). The officer is responsible for recording hunt activities on specified forms such as the Safari Hunting Monitoring form and Trophy Measurement form. The officer endorses licenses to ensure that they are not used more than once and the officer also ensures that all harvested trophies are registered (DNPW 2016).

Hunting-generated Revenue:

DNPW receives revenue by charging GMA fees per lion hunt. They also receive funds from annual professional hunter fees, certificate of valuation of trophies fees, certificate of ownership of trophies fees, permit fees, handling fees, and CITES security stamp fees. Hunting license fees in Zambia are statutory. The foreign hunter looking to take a lion must pay the fee directly to the outfitter, with the minimum amount currently set at $4,200. DNPW collects these fees from the outfitter/ concession and does not deal with the foreign hunter directly. Therefore, the outfitter may choose to charge the foreign hunter any amount greater than $4,200. The revenue generated from license fees (also referred to as Animal fees by DNPW) is mandated to be shared with CRBs under the Zambia Wildlife Act No. 14 of 2015. The fees are shared with CRBs and DNPW as follows:

License fees (animal fees):

- 5% of funds go to the CRB chief/leader.
- 45% of funds go to CRB community funds.
    - According to Zambia's "Guideline on the use of Community funds accrued from wildlife management", 45% of these community funds should go to wildlife protections and patrols, 35% should go to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds should go towards CRB administration costs.
- 50% of funds go to DNPW (mandated under the Zambia Wildlife Act No. 12 of 1998 and continued in the Wildlife Act) in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

According to Zambia's hunting guidelines, hunts involving lions are required to be a minimum of 16 days (DNPW 2016). A daily conservation fee of $150 per hunter and $100 per observer is collected for monitoring purposes (DNPW 2016). These daily hunt fees typically cover combined hunt packages that include hunting lion, along with other species such as hippos and impalas. The fees are allocated by percentages to CRBs and DNPW as follows:

Daily fees (Concession fees):

- 5% of funds go to the CRB chief/leader.
- 15% of funds go to CRB community funds.
    - Based on recommended guidelines, 45% of these community funds go to wildlife protections and patrols, 35% goes to community projects such as constructing clinics, roads, schools, and wells, and 20% of the funds go to CRB administration costs.
- 80% of funds go to DNPW in the form of conservation funds, including, but are not limited to: scout/wildlife officer salaries, resource protection, consultancy and legal fees, animal surveys, staff training, administrative and operational expenses, repair and maintenances, and other conservation expenses.

Hunting fees for all species accounted for 32% of revenues that DNPW received during 2010 - 2012. However, that amount was reduced to about 4% during the 2013 and 2014 moratorium (DNPW 2016). Safari hunting also creates other revenue for Zambia, through activities such as tipping, eating in restaurants, staying at lodges, purchasing souvenirs, and paying for taxidermy.

Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for endangered species permits (50 CFR 17.32(a)(2)). In evaluating each of these criteria on the basis of information available to the Service, we have been able to determine that this import of the wild lion trophy would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is **adequate to justify removing from the wild** or otherwise changing the status of the wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions has demonstrated the ability to contribute toward positive conservation outcomes that mitigate or improve the status of lions throughout their range within Zambia, while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion.

The IUCN's 2012 Guiding principles on trophy hunting support the concept that hunting can provide a conservation benefit if it is part of a governance system that provides both implementation and enforcement at a level that adequately supports conservation. The Service also believes that conservation hunting can assist the wild lion populations if managed well. Lion hunting, if managed properly, could meet the Service's enhancement criteria under the Act. There must be adequate information and data clearly showing that removing lions from the wild for trophy hunting will be done at a level and with sufficient oversight such that it improves the current status of lions in the wild (50 CFR 17.32).

Zambia has demonstrated their desire to maintain the long-term conservation of their lion population with their 2013-2015 moratorium on lion hunting. When the Zambian government realized that population numbers were declining to an unstainable level, they applied the

moratorium for 3 years, until they determined that their lion population increased enough to tolerate limited offtakes (DNPW 2016).

As mentioned in the sections above, the Zambian government has clarified that they have established block quotas by surveying lion populations through a combination of aerial surveys and information obtained from ground counts, patrol sightings, local and expert opinion, and hunting monitoring. Because surveys are continually being carried out on the current population of lions in Zambia, future findings will consider updated population data. Therefore, the Service will need to continue to monitor the effectiveness of new lion surveys that contribute to determining the population status of lions in correlation with hunting block quotas.

The difference in male turnover between hunting/non-hunting periods is apparent from cub survival rates. Macdonald (2016) reports that in the absence of hunting, 80% of cubs survived to one year of age, during the trophy hunting period, 66% of cubs survived to one year of age. The principle behind restricting trophies to older males is that their tenure in the pride should have been long enough to raise at least one generation of cubs to adulthood. However, lion experts have come to varying conclusions regarding the minimum age recommended for sustainable lion hunting. Creel *et al.* (2016), not only state that the minimum hunting age should be 7-8 years old, but they also conclude that age-restricted harvesting is not sufficient to yield sustainability by itself. However, other experts believe that the sustainable age of lions is five years and older, provided that proper identification/aging can occur before the animal is harvested. Nonetheless, lion experts are in consensus that hunting lions younger than five years old may not be sustainable. Zambia's recommended hunting guidelines are in line with the minimum age of five-year-old lions, but the Service is concerned that allowing for the export of lions under this age (Zambia allows export of four-year-old lions, but not less than four years old) may not be sustainable. Zambia will need to closely monitor the number of exports of "under age" trophies to determine if there are sufficient disincentives to discourage taking such animals.

The Zambian government has done a good job of identifying how resources from hunting-generated revenue would be shared with communities. The local communities receive funds from concessions and license (animal) hunting fees. As outlined in the license fee distribution above, 35% of the funds allocated to CRBs help support community projects such as constructing clinics, roads, schools, and wells, thereby providing incentives for the local community to ensure the long-term conservation of the lions. In addition, 45% of the CRB license fees go to wildlife management, including resource protection and patrols.

Zambia's human population growth has contributed to conflicts within the GMAs. As clarified above, DNPW contributes 50% of the license fees (animal fees) and 20% of the Concession fees to local communities. These financial benefits received from living in a GMA have provided incentives for newcomers to illegally squat in the GMAs looking to capitalize on the financial benefits. Consequently, the illegal squatting has caused enough conflict with local people to trigger action to be taken by the Zambian government. In August of 2015, over 2,000 squatter households within the Mumbwa GMA were evicted so that the registered local communities could receive the full benefits of living within a conservation area (DNPW 2016). The long-term impacts of the eviction will need to be considered in future findings, as the information becomes available.

Therefore, based on the information available to the Service and considering that the lion to be imported was harvested in compliance with Zambian laws and regulations, we conclude that the

purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

As described under Current Lion Status in Zambia above, Zambia has taken great strides to address the major threats facing lions through their hunting program and updated regulations. In 2010, Zambia developed a ten-year Conservation Strategy and Action Plan for the African lion. Since the establishment of the Action Plan, the Zambian government has cooperated with partners to implement the strategy (DNPW 2016). Monitoring, local community benefits, human lion-conflict, and land use planning are only some of the benefits of the Action Plan (DNPW 2016). The development of the Community-Based Natural Resource Management Unit has helped facilitate Zambia's economic and social well-being by providing technical support to CRBs, training of village scouts and CRB members, and monitoring the use of funds disbursed to the CRBs. An investigative unit also carries out investigations related to wildlife crimes. Furthermore, the President of the Republic of Zambia has also directed the Defense san security wings in the country to join in the fight against poaching.

Taking into account that the off-take of wild lions is currently being monitored by the Zambian government, that the government of Zambia is implementing an age-based harvest strategy and a precautionary quota, and that the government of Zambia's management of lions provides community benefits, Mr. Dupuis' hunting and subsequent import of this lion provides an indirect benefit to wild populaitons by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

We are not aware of any programs intending to enhance the survival of lions in Zambia that would conflict with Zambia's management plan. However, we are aware of the Zambian Carnivore Programme (ZCP), which is a non-profit Zambian registered trust that is dedicated to conserving large carnivore species and the ecosystems they reside in. The program works to build capacity within local Zambian organizations and government bodies for the sustainable conservation of large carnivores and herbivores, their ecological functions, and their habitats. Therefore, based on the information available to the Service, the issuance of an import permit for this legally hunted wild lion would not conflict with any known conservation program for the species.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

In evaluating this criterion, the Service assesses whether the hunting program established for lions is subject to a governance structure that clearly allocates management responsibilities and supports regulatory pathways in support of positive conservation outcomes. Zambia's lion management

program is based on a precautionary quota, an age-based harvest with monitoring of off-takes, and direct community benefits (DNPW 2016).

Currently, per Zambia's approved budget, DNPW retains all revenue from sport hunting. 50% of animal fees and 80% of concession fees are allotted to DNPW as conservation funds. This funding source is vital to lion conservation because it supports on-the-ground conservation, protected area management, and enforcement efforts. Additionally, 45% of animal fees and 15% of concession fees go to communities where the hunts take place. As long as communities continue to benefit from the sport hunting of lions through job opportunities, funded community projects, and sharing of meat derived from hunting, they may have the incentive to protect it.

Given that lion management in Zambia allows limited, controlled off-take of lions in a manner that mimics natural processes and provides community benefits, the legal hunt undertook by Mr. Dupuis will contribute to reducing the threat of extinction of lions in Zambia. The utilization of hunters, such as Mr. Dupuis, in managing the lion populations in GMAs and OGRs is an important element of the success of lion management in Zambia.

Therefore, based on the information available to the Service, the purposes for which this import permit would be issued would likely reduce the threat of extinction facing lions in Zambia.

17.32(a)(2)(v): <u>The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application</u>:

As with any discussion of hunting, there are numerous opinions on the impact that hunting has on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for as long as possible by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be obtained through a science-based hunting program for lions. There have been a large number of comments from some NGOs and the public opposing hunting any lions, but particularly captive-bred lions. This opposition, however, is primarily based on the perceived ethics of hunting. While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process.

Therefore, based on the information available to the Service, there is general support from scientists and other persons or organizations having expertise concerning lions that the legal well managed, science-based harvest of lions, and the subsequent import of these trophies, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

17.32(a)(2)(vi): <u>Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application</u>:

Examining whether adequate resources exist, the Service relied primarily on information provided by Zambia (DNPW 2016). The long-term survival of lions in Zambia, is directly tied to the economic and ecological success of the country. When ZAWA became a semi-autonomous agency,

they struggled with funding to provide for adequate staffing and fulfillment of lion conservation objectives. However, after transforming back to a government agency, DNPW (formerly ZAWA) has been able to ensure that staff are adequately resourced and paid by Zambia's government, while retaining funding generated from sport hunting, as per the approved budget for the country. This ability to deliver on conservation objectives is improved with funding provided by U.S. sport hunters such as Mr. Dupuis.

Therefore, based on the information available to the Service, the applicant undertook a legal, authorized hunt, abiding by management practices in accordance with the government of Zambia's laws and regulations, having the expertise, facilities, and other resources available to him to successfully accomplish the objective stated in the application.

Conclusion

Given the current status of lions within Zambia and the level of management and oversight provided to lions, it appears that the harvest and import of this lion as a sport-hunted trophy meet the purposes of the Act. Zambia's ongoing adaptive management and limited off-take of lions is important to the survival of lions in Zambia.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this wild lion will enhance the propagation or survival of the species. Therefore, the Service **is able to authorize the import of one male wild lion trophy taken in Zambia, to Steven (b) (6) Dupuis.**

Darcy Vargas, Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano 6/8/18
Mary Cogliano, Chief
Branch of Permits
Division of Management Authority

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LION ZAMBIA ESA TROPHY

Permit Number: MA78597C-0

Effective: 06/08/2018 Expires: 06/07/2019

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

Mary Coglianese

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

STEVEN (b) (6) DUPUIS (b)
(b) (6)
LAFAYETTE, LA (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2018 hunting season and in accordance with government of Zambia hunting laws and regulations.**

D. Trophy must be accompanied by valid hunting authorization issued by the government of Zambia for the 2018 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).

RCVD MAR 30 2018

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 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: Eubulu (b) (6) Kerr (b) (6)

Date: 19 MARCH 2018.

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD MAR 30 2018

LB

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
KERR	Eubulus	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone numb(b) (6)	nate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Shreveport	LA	(b) (6)		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. 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): MARCH 19th 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:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) 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

(4) 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.

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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 regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
myself - (b) (6) [redacted]

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.

4. 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.

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:
   MATETSI Unit 1, Matabeland North, Victoria Falls, Zimbabwe.

   b. Date wildlife is to be hunted: MAY 1 - 21st, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   MARTIN Pieters

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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). NOT hunted Yet.

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: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Road
City: Belmont
State/Province: Bulawayo, Zimbabwe.
Country, Postal Code:

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?

   PLEASE SEE ENCLOSED + INFO SUBMITTED BY CONSERVATION FORCE + ZPWMA

   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?

   " "

   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?

   " "

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: MARCH 19th, 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.

All international shipment(s) must be imported 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).

MARTIN PIETERS
~ SAFARIS ~

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Big game hunting in Zimbabwe.....making a difference to communities

Hunting in Zimbabwe

When you think of Africa, what comes to your mind.....lush plains,flowing rivers,animal migrations.....big cats, safari lodges and kitted game drive vehicles, visions conjured up by numerous wildlife documentaries, dvd's showing exclusive photographic safaris with discerning clientele being pampered by attentive staff.....yes the scenes shown to us make us believe that all is well in Africa. Thats all very well, but realistically, Africa is not all about the above, there are many, many areas that have limited land use options, this is based on rainfall, wildlife numbers, accessibility and terrain. Most of these ' forgotten areas ' are not good enough for the photographic companies, no one wants to invest in the unknown, return on investment would be negative....., so what happens.....

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› Zimbabwe hunting

Enter the safari operator,professional hunter and dedicated wildlife enthusiast.....the client. Countless millions of dollars are poured into these areas annually throughout Africa by true conservationists, people who care about the preservation of our species for future generations. One such area (and there are many) is the Omay, Nyaminyami RDC, operated by Martin Pieters Safaris, www.martinpieterssafaris.com

For many years we have poured hunters dollars into this remote area, educating communities, conducting anti poaching actives, reintroduction and relocation of wildlife , construction of clinics and schools..... 9 years down the road, what do we have.....an area renowned for big game, a community that is happy and a generation that focuses on wildlife conservation and not poaching activities.

In 2014, African conservancies was born and plans for the Ume River Conservancy were laid on the table, further cementing the relationship between dedicated safari operators and the community, allowing them to be directly involved in wildlife based decisions. Plans are currently underway with approval from local government to create a large remote conservancy where sustainable off take of certain species will form the back bone of wildlife conservation. 2 years down the road, we are already seeing the results as populations of several species are increasing whilst poaching activities are decreasing.

There is a lot to be done, but by taking these positive steps, by involving the local residents, by making use of these ' remote and forgotten areas ', areas that are unsuitable for the typical pampered photo safari enthusiast.....we will continue to turn them into areas teeming with wildlife, an area to be proud of.....thank you to our hunters.

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Next time you are stuck in traffic, have a delayed flight or are shovelling snow off your porch.....close your eyes, dream of Africa, there is no better time to come hunting in Zimbabwe than today.

Our efforts today will be enjoyed by our children of tomorrow.

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By Martin Pieters | November 18th, 2015 | News | 0 Comments

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MARTIN PIETERS
~ SAFARIS ~

Sustainable off take benefiting communities

Sustainable off take

Since 2007 we have been involved in dedicated wildlife conservation through sustainable off take, quota control, anti poaching and community based wildlife education in the Omay campfire concession.

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The Omay (NyamiNyami RDC) is a vast (2 million acres) populated communal land which one of the first areas to be given the CAMPFIRE status, whereby local communities benefit from wildlife off take, it is not rocket science that this program works as we continue to see an increase in wildlife numbers in our area. Communities receive direct benefit both financially and through various projects implemented by Martin Pieters safaris such as clinics, schools, vehicles for anti poaching and the employment of scouts. It must be noted that the Nyaminyami RDC is a remote inhospitable concession that has no other land use model due to very erratic and low rainfalls, an abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.

We at Martin Pieters safaris, www.martinpieterssafaris.com employ locals in all our camps as well as a dedicated anti poaching team that works alongside the RDC (council), national parks, the police and the MAPP (Matusadonna anti poaching project), we continue to collect snares, arrest poachers and follow up on convictions and more importantly, educate people on the long term sustainable use of our national heritage. This method has been proven and several past poachers have turned tables and are now our most trusted wildlife officers, using their past notorious skills to help us protect our wildlife.

Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting

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company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti poaching, continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through the destruction of their crops on an annual basis, or the loss of one of their family members.

Our wildlife populations are on the rise, we border the Matusadonna national park, there are no fences to stop animals movements, we are very much needed, even more so now with current rainfall patterns at their lowest, poaching will increase as people find it difficult to grow crops, we will not let the last 10 years of effort to protect our wildlife be a waste, we will not leave these villagers high and dry with no form of income or food.

We thank our hunters for their continued support. It is because of you that our conservation methods are successful.

We spend in excess of $ 40 000 / annum on anti poaching

We have collected over 15 000 wire snares since 2007 saving thousands of animals.

We assist in arrests of subsistence poachers and heavily armed

elephant poachers, we follow up with convictions so that these men and women can be put away and our animals will be safe.

We monitor game movements and patterns and adjust our quotas accordingly so that we continually have an increase for future generations

We have assisted in the construction of clinics, schools and information centers.

We employ over 30 locals in our camps and in the field thus as siting hundreds of locus through indirect benefits.

Last but not else, we pay over $ 200 000 in direct benefits annually to the RDC and the local wards for wildlife off take.

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Anti poaching ...fighting back

AFRICAN CONSERVANCIES ANTI-POACHING 2015

AFRICAN CONSERVANCIES

African Conservancies was established in 2014, it's first project was in Nyaminyami Rural District Council in the Omay Communal Land hunting area. A.C comprises Carbon Green International, the relevant Rural District Council and the relevant community in which the conservation plan falls. A trust has been formed that will include these parties as beneficieries.The primary goal of A.C was to locate a suitable area to form, build and manage a sustainable community conservation area. The Omay 1 hunting area between the Ume and Sengwa Rivers was selected as a perfect phase one. The criteria of selection includes; being communal land hunting area, fall within the C.G.I REDD+ project area.

OBJECTIVES OF AFRICAN CONSERVANCIES

The primary objective of A.C was to select an area within the REDD+

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project, (stretching from Binga to Kanyemba in the communal areas) and partner the community and council. The belief in building sustainable conservation areas and in particular enabling communities to truly and directly benefit from from this sustainable utilization is at the core of this project.

The immediate goals with the Ume River Community Conservation Area were to reduce hunting offtake and reduce poaching. The hunting offtake was reduced in 2014 and in 2015. For example, 2014 saw twelve buffalo being hunted from the quota of thirty five. 2015 we will have a buffalo offtake of ten from the possible thirty five. Having done our own numbers on the ground, our offtakes are very conservative and the population increase through relocation due no pressure is clearly visible with far better trophy quality.

Anti poaching began in 2014, the six C.G.I scouts based out of Manyuli camp close to the Gokwe boundary and six scouts based out the Ume hunting camp. We decided at the close of 2014 that the anti poaching was not having enough effect on the structured elephant poaching, so in March 2015 Steve Wentzel and I decided that it needed direction and management. So beginning March, I personally came into the Omay to oversee and manage the anti poaching teams.

I immediately amalgamated the two teams and brought in Mr. Charles Khumalo to head up this new team. Charles is ex Zimbabwean National Army, a brave, dedicated leader who has commanded not only the respect of this unit, but myself and the community at large.

We started in house training incorporating weapons training, tactical house clearances, offensive tracking and building a more intense unit that could cope with a far more aggressive natured outlook to the poaching problems. This immediately began to produce results.

Our focus has been on hardened armed poachers with the theory that the snare and dog meat poachers would be dealt with in the process of eliminating the more "serious" elements.

AREA OF OPERATIONS

Though we in theory are based in the Omay communal land, our operations stretch into Gokwe, around Chizarira and Charisa and Binga. due to our operations being outside of the National Parks we predominantly operate with Police details and R.D.C scouts. Our entire unit has now been accepted as Police reservists and are awaiting their Police force numbers. It has been agreed that our unit

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having been accepted as reservists, will establish a dedicated reaction team within the police force that I shall train and manage.

OPERATIONS

Begining 2014 we funded the basing of James Mcallwain from MAPP out our hunting camp in Chipfudze on the Southern boundary of the Matusadona National Park. The reasoning for this was obviously to maintain the Parks presence on this boundary, which was non existent due to lack of capacity. Secondarily, James was to establish an informant network that would offer up targets for our unit to react to. This was very effective and results were immediate.

With James leaving MAPP in August 2015, the MAPP trustees unfortunately decided to move their operations back into the Park. This led to a huge information breakdown and vacuum.

August 2015 Charles Khumalo was tasked in resurrecting and bettering the information networks as reacting to shots fired is almost a pointless affair. The poaching teams shoot toward last light, fifteen minutes from shots fired, the elephants face is chopped off and they are moving.There is no way to track them fast enough to catch them up at this stage. The needle in haystack affair is almost pointless for arresting poachers. There are over one hundred and fifty square kilometers of bush to patrol, it would require an army to do this. Our first goal was to bring into operations a full time intelligence operative whome we had been grooming for this position.

The informant/intelligence network has had significant effect, we have over one hundred and twenty people on our books. Over ninety percent of our arrests have occurred and been made possible through the capturing or paying for intel. We have put in place "watchers" who monitor targets and wait for opportunity to ensure arrests have hard tangible evidence for prosecution. "Mapani" whom he was second on our priority list and pulled the trigger on the three elephant days after the Sebungwe Action Plan Meeting; was monitored for four months prior to his arrest late October. Literally we actioned the arrest when his "watcher" informed us that he had begun drinking beer with tusks and firearms still being present. After four long months, he eventually made a mistake!

ARRESTS

Below are a list of arrests of hardened elephant poachers, I have omitted all of our lessor arrests of meat poachers.

February 7th 2015

Reaction to shots fired Matusadona southern boundary resulted in a joint op with Parks rangers with our tracker team. Poaching team ambushed and two armed poachers killed. One "John Raymond" being a casualty of this contact was fourth on our priority list. Firearm 303 recovered.

February 12th 2015

Sting operation on the Gokwe boundary resulted in the arrest of three "dealers" supplying arms and ammo to the poaching syndicates. One tusk, thirty rounds 303 and forty five 7.62 intermediate (AK 47) rounds recovered.

March 12th 2015

Contact and exchange of fire in Manyuli, no casualties but a 303 rifle recovered.

April 22nd 2015

Raid carried out on "Magura" syndicate whilst infiltrating. Arrests effected on entire team of four with recovery of 303 rifle.

April 23rd 2015

Intel from "Magura" arrests led to the arrest of "Mark Neberi" who was third on our priority list.

June 23rd 2015

"Jabu" syndicate shot and killed an elephant in the park on the late afternoon of the 22nd June. Sting operation produced 20kg tusks and an arrest. Further information led to the arrest of team members.

July 23rd 2015

Escapees from the February contact arrested and two 303 rifles recovered.

October 22nd 2015

"Mapani" second on our priority list finally cornered with seven tusks one 303 rifle and one 450 watts. His accomplice and partner "Malalanzi" could not be implicated in this arrest, remains monitored and in second place on our priority list. 375 rifle they were using has been "located" and is being monitored for uplift.

FUTURE OPERATIONS

Future operations will continue in the Omay communal land, the hard hitting unit has had a serious effect on poaching syndicates. The informant network has reduced the "safety" factor for the syndicates. We are able to reach right into their homes and they have no secure areas to operate in.

The community outreach via the chiefs seems to be having an effect. Chief Negande has issued an order that anyone assisting poaching syndicates will be banished from the Omay. The subsequent banishing of two of his subjects over the last month has sent a very strong message about how serious he has become!

The upsurge in armed Zambian incursions in the lower Zambezi has us concerned with intel coming in of Zambian teams planning to operate here. The Cyanide is our major concern. Having only picked up poisoned fruit in July with no further cyanide incidents we were fairly relaxed about it. Subsequent to the MAPP arrest of the "Kariba" cyanide team, one of their members who escaped prosecution has been into our area. I am currently running a campaign in the community educating them of this problem. It is finally dawning on people that these elephant poachers will poison water sources that will not only kill elephant, but their livestock and families are at risk to.

As always, funding these operations and supplies of material are a constant battle. Carbon Green and Ume River Conservancy face the brunt of this funding with perpetual short falls. We rely on cell phones for communications, which is erratic at best! Firearms and ammunition have been supplied by me personally, again we are short if all members are in field. The idea of us tackling these teams with catapults and axes sounds ludicrous but is whats happening! So we are perpetually looking for help keeping the ball rolling.

Chris Moore

Ume River Conservancy

13th November 2015

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NYAMINYAMI RURAL DISTRICT COUNCIL

The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE)

The background of the Community Based Natural Resources Management approach in Zimbabwe

In Zimbabwe the Community Based Natural Resources Management is practiced under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). The programme started in 1988 and Nyaminyami Rural District Council and the then Mbire Rural District Council were the pioneers in starting to implement it. Nyaminyami has 12 wards and 11 of them partake in the CAMPFIRE programme. The concept is to ensure that the local communities are benefiting from the sustainable utilization of their natural resources. The major source of the revenue for the community under this programme is the sport hunting. The district has three hunting concessions namely Omay Area1 under Bulembi Safaris t/a Martin Pieters safari, Omay area 2 under Safrique safaris and Gache Gache Area 3 under Track-A-Hunt safaris. The funds derived from this source are channeled straight to the producer communities for community developmental projects. The district has got a department of wildlife which together with other stakeholders combats illegal exploitation of natural resources as realized as of economic and social importance. Below is revenue accrued from 2013 to 2014, projects implemented by respective wards and law enforcement efforts.

NYAMINYAMI RURAL DISTRICT COUNCIL

BULEMBI SAFARIS/ MARTIN PIETERS SAFARIS TROPHY FEES FOR TROPHY FEES JANUARY.....DECEMBER 2013

MOLA WARD 3

Species	Sex	Number killed	Unit Price $	Total Price	45% dividend to the ward
Elephant	M	3	9100	27300.00	12285.00
Elephant	Tuskles	3	2100.00	6300.00	2835.00
Buffalo	M	16	2100.00	33600.00	15120.00
Buffalo	F	5	750.00	3750.00	1687.00
Leopard	M	6	2550.00	15300.00	6885.00
Zebra		8	800.00	6400.00	2880.00
Impala	M	11	160.00	1760.00	792.00
Crocodile		7	1750	12250.00	5512.50
Baboon		9	25.00	225.00	101.25
Warthog	M	1	250.00	250.00	112.00
Hippos		9	1800.00	16200.00	7290.00

Bushbuck	M	10	500.00	5000.00	2250.00
Kudu	M	3	800.00	2400.00	1080.00
Klipspringer	M	1	400.00	400.00	180.00
Duiker	M	1	100.00	100.00	45.00
Hyena		2	220.00	440.00	198.00
Lion	M	1	5000.00	5000.00	2250.00
Porcupine		1	30.00	30.00	13.50
Total				**147045**	**66170.00**

SAFRIQUE SAFARIS TROPHY FEES FOR TROPHY FEES JANUARY .....DECEMBER 2013

Species	Sex	Number killed	Unit Price $	Total Price	45% dividend to the ward
Crocodile		1	1750.00	1750.00	787.50
Impala	M	1	160.00	160.00	72.00
Total				**1910.00**	**859.50**

BULEMBI SAFARIS TROPHY FEES FOR JAN .....DEC 2013

MOLA WARD 4

SPECIES	SEX	NUMBER KILLED	UNIT PRICE US $	TOTAL PRICE US$	45% DIVIDEND TO THE WARD
Elephant T/less		5	2100.00	10500.00	4725.00
Buffalo	M	10	2100.00	21000.00	9450.00
Buffalo	F	1	750.00	750.00	337.50
Impala	M	20	160.00	3200.00	1440.00
Impala	F	6	90.00	540.00	243.00
Hippos		8	1800.00	14400.00	6480.00
Bushbuck	M	7	500.00	3500.00	1575.00
Waterbuck	M	11	1400.00	15400.00	6930.00
Leopard	M	1	2550.00	2550.00	1147.00
Zebra		3	800.00	2400.00	1080.00
Crocodile		4	1750.00	7000.00	3150.00
Kudu	M	2	800.00	1600.00	720.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon		2	25.00	50.00	22.50
Warthog	M	1	250.00	250.00	112.50
Monkey		1	15.00	15.00	6.75
Sable	M	1	2200.00	2200.00	990.00
Ducks		1	5.00	5.00	2.25
Total				**85760.00**	**38 592.00**

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

MOLA WARD 4

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
HIPPOPOTMUS	M	4	1800	7200	3240
CROCODILE	M	2	1750	3500	1575
ZEBRA	M	1	800	800	360
IMPALA	M	3	160	480	216
TOTAL				**11980.00**	**5391.00**

SAFRIQUE SAFARIS / Martin Pieters safaris TROPHY FEES FOR TROPHY FEES JANUARY.....DECEMBER 2013

NEBIRI WARD 7

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
ELEPHANT	M	1	9100	9100	4095
ELEPHANT	TIUSKLESS	2	2100	4200	1890
BUFFALO	M	12	2100	25200	11340
BUFFALO	F	3	750	2250	1012
LEOPARD	M	2	2550	5100	2295
ZEBRA	M	2	800	1600	720
IMPALA	M	2	160	320	144
BABOON	M	7	25	175	78.75
HYEANA	M	2	220	440	198
KLIPSPRINGER	M	1	400	400	180
KUDU	M	1	800	800	360
TOTAL					**22 313.25**

BULEMBI SAFARIS / Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

NEBIRI WARD 7

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
BUFFALO	M	2	2100	4200	1800
TOTAL					**1800**

SAFRIQUE SAFARIS/ Martin Pieters safaris TROPHY FEES FOR JANUARY TO DECEMBER 2013

MSAMPAKARUMA WARD 9

SPECIE	SEX	NUMBER KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% TO WARD
ELEPHANT	TUSKLESS	2	2100	4200	1890.00
BUFFALO	M	3	2100	6300	2845.00
LEOPARD	M	1	2550	2550	1147.00
KUDU	M	1	800	800	360.00
BUFFALO	F	1	750	750	337.00
BABOON	M	2	25	50	22.50
TOTAL					6592.50

BULEMBI SAFARIS

BUFFALO	M	1	2100	2100	945.00

Mola ward 3 wildlife project dividends 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO.KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Elephant	m	2	9 100.00	18 200.00	8 190.00
Elephant	t/i	3	2 100.00	6 300.00	2 835.00
Buffalo	m	10	2 100.00	21 100.00	9 450.00
Buffalo	f	1	750.00	750.00	337.50
Hippo		12	1 800.00	21 600.00	9 720.00
Waterbuck	m	2	1 400.00	2 800.00	1 260.00
Crocodile		9	1 750.00	15 750.00	7 087.50
Lion	m	1	5 000.00	5 000.00	2 250.00
Leopard	m	3	2 550.00	7 650.00	3 442.50
Spotted hyena		6	220.00	1 320.00	594.00
Impala	m	8	160.00	1 280.00	576.00
Impala	f	6	90.00	540.00	243.00
Bushbuck	m	6	500.00	3 000.00	1 350.00
Baboon		12	25.00	300.00	135.00
Civet cat		1	100.00	100.00	45.00
Warthog	m	1	250.00	250.00	112.50
Jackal		1	80.00	80.00	36.00
Klipspringer	m	1	400.00	400.00	180.00
TOTAL					48 874.00

Mola ward 4 Tayanda wildlife project dividends for 2014 by Bulembi safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Elephant	M	1	9 100.00	9 100.00	4 095.00
Hippo		5	1 800.00	9 000.00	4 050.00
Impala	M	9	160.00	1 440.00	648.00

Impala	F	3	90.00	270.00	121.00
Kudu	M	1	800.00	800.00	360.00
Sable	M	2	2 200.00	4 400.00	1 980.00
Crocodile		1	1 750.00	1 750.00	787.50
Baboon		1	25.00	25.00	11.25
Bushbuck	M	1	500.00	500.00	225.00
Waterbuck	M	1	1 400.00	1 400.00	630.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Zebra		1	800.00	800.00	360.00
TOTAL				32.035.00	14 415.75

Nebiri ward 7 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	3	2 550.00	7 650.00	3 442.50
Kudu	M	1	800.00	800.00	360.00
Hyena		1	220.00	220.00	99.00
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		3	25.00	75.00	33.75
TOTAL				11 095.00	4 992.75

Kasvisva ward 8 wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Bushbuck	M	1	500.00	500.00	225.00
Elephant	t/l	2	2 100.00	4 200.00	1 890.00
Total				9 350.00	4 207.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO, KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945.00
TOTAL				2 100.00	945.00

Mola ward 3 wildlife project dividends 2014 by Safrique safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND

Hippo	m	4	1 800.00	7 200.00	3 240.00
Lion	m	2	5 000.00	10 000.00	4 500.00
Bushbuck	m	2	500.00	1 000.00	450.00
Buffalo	m	1	2 100.00	2 100.00	945.00
Baboon	m	1	25.00	25.00	11.25
Duiker	m	1	100.00	100.00	45.00
Spotted hyena	m	1	220.00	220.00	99.00
Klipspringer	m	1	400.00	400.00	180.00
Waterbuck	m	1	1 400.00	1 400.00	630.00
TOTAL					10 100.25

Mola ward 4 Tayanda wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO .KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Waterbuck	M	2	1 400.00	2 800.00	1 260.00
Impala	M	2	160.00	320.00	144.00
Impala	f	1	90.00	90.00	40.50
Total				3 210.00	1 444.50

Negande ward 6 Luyando wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	m	2	2 100.00	4 200.00	1 890.00
TOTAL				4 200.00	1 890.00

Nebiri ward 7 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Kudu	M	1	800.00	800.00	360.00
Klipspringer	M	1	400.00	400.00	180.00
Baboon	M	3	25.00	75.00	33.75
Buffalo	M	1	2 100.00	2 100.00	945.00
Buffalo	F	2	750.00	1 500.00	675.00
Zebra		2	800.00	1 600.00	720.00
Duiker	M	1	100.00	100.00	45.00
Sable	M	1	2 200.00	2 200.00	990.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	2	160.00	320.00	144.00
TOTAL				11 645.00	5 240.25

Kasvisva ward 8 wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Waterbuck	M	1	1 400.00	1 400.00	630.00

Elephant	t/l	3	2 100.00	6 300.00	2 835.00
S. Hyena	M	2	220.00	440.00	198.00
Buffalo	M	3	2 100.00	6 300.00	2 835.00
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Impala	F	1	90.00	90.00	40.50
Baboon		2	25.00	50.00	22.50
Total				17 290.00	7 780.50

Msampakaruma ward 9 (Ndechedu) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	2	2 100.00	4 200.00	1 890.00
Hyena	M	2	220.00	440.00	198.00
Total				4 640.00	2 088.00

Msampakaruma ward 10 (Nyamambishi) wildlife project dividends 2014 by Safrique Safaris

SPECIES	SEX	NO. KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Leopard	M	1	2 550.00	2 550.00	1 147.50
Impala	M	1	160.00	160.00	72.00
Grysbok	M	1	80.00	80.00	36.00
Total				2 790.00	1 255.50

Msampakaruma 10 (Nyamambishi) wildlife project dividends 2014 by Bulembi Safaris/ Martin Pieters safaris

SPECIES	SEX	NO, KILLED	UNIT PRICE US$	TOTAL PRICE US$	45% DIVIDEND
Buffalo	M	1	2 100.00	2 100.00	945,00
Total				2 100.00	945,00

Summary of funds disbursed to the communities

Year	Ward	DIVIDEND RECEIVED US$
2013	GACHE GACHE 2	19,834.88
	MOLA 3	67,029.5
	MOLA 4	43,983.00

	NEBIRI 7	**24,113.25**
	MSAMPAKARUMA 9	**7,537.5**
2014	GACHE GACHE 2	**25 353.00**
	MOLA 3	**58 974.00**
	MOLA 4	**15 860.25**
	NEGANDE 6	**1 890.00**
	NEBIRI 7	**10 233.00**
	KASVISVA 8	11 988.00
	MSAMPAKARUMA 9	3033.00
	MSAMPAKARUMA 10	2200.50

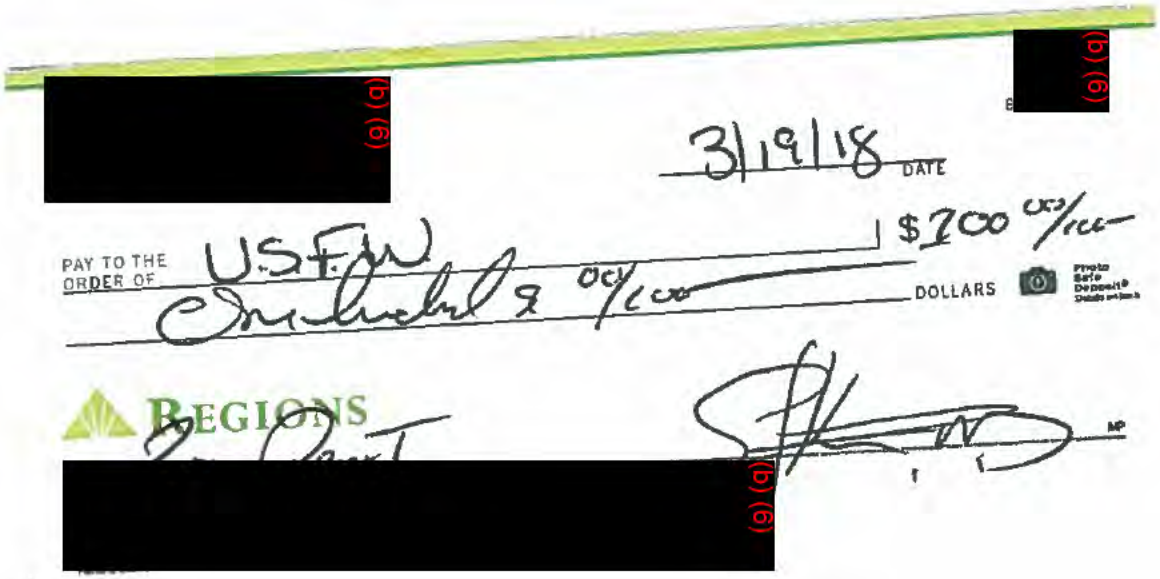
PROJECTS IMPLEMENTED BY THE COMMUNITY UNDER CAMPFIRE FUNDS

WARD	PROJECTS IMPLEMENTED
2 GACHE GACHE	Constructed GacheGache Sec School Classroom block
	Purchased GacheGache Sec School furniture
	Renovated GacheGache Sec Sch Teachers House
	GacheGache Pry Sch Repainting
3 MOLA	Constructed Musampa Fishing Camp Toilets
	Borehole Repairs & Maintenance
	Constructed Ward Office Toilets
	Purchased materials for construction of Mangwara School Teachers House
	Mola Pry Sch Computer room buglar bars
	DhobeSatelite School
	Construction of Kasiya Pre- School shed
	Dhundwe Pre-School renovation
4 MOLA	Kauzhumba Pipeline Food
	Traditional Ceremonies
	Brick Moulds (bricks for Mayovhe classroom block to be constructed)
	Purchased materials for construction of Jongola Primary School Teachers House
	Completion of Mayovhe Primary School Classroom Block -
	Rehabilitation of Marembera Pipeline
7 NEBIRI	Rehabilitation of Biri Water Pipe Line
	Construction of feeder roads
	Tractor Repairs & Fuels

	Ward Office Repairs & Maintenance
	Maya Pre - School Repairs & Maintenance
8 KASVISVA	Constructed Manhanga Pry School 1x2 classroom block
	Constructed Mamvuramachena Sec Sch 1x2 classroom block
	Constructed Mamvuramachena Pry Sch Admin block
	Renovated Mangare Pre- School
	Constructed Mutengu School Teachers Cottage
	Constructed SawiraMakwande Teachers Cottage
	Construed Black Boards for 2 satelite schools
9 MSAMPAKARUMA	Majazo Primary School Teachers House Repairs
	Chidyamugwamu Secondary School Teachers House Repairs
	Purchased materials for construction of Majazo classroom block

Wildlife anti-poaching efforts

Year	Number of patrolled done	Snared recovered	Recoveries	Animal poached	Number of poachers arrested
2013	139	76 cable snares	3 x303rifles 1x 458 rifle 10 rounds of AK47 30 rounds of	8 elephants 1 waterbuck 3 impala I buffalo	25 in connection of ivory dealing 51 in different wildlife counts
2014	150	89 cable snares	4 pairs of ivory 1 x30-06 Rifle plus 2x 30-06 Rounds 3 X Banana boats plus 3 800Mitres twine nets and 17KG of dried fish 1x Pick, 1 x Shovel Plus crow bar	2 buffalo 7 elephants 2 impalas 1 duiker	15 in connection of ivory dealings 32 of different counts including fish poaching


[redacted] (b) (6)

[redacted] (b) (6)

3/19/18 DATE

PAY TO THE ORDER OF U.S.F.W. $200 00/100

DOLLARS

REGIONS

[redacted] (b) (6)

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G TEER, PH.D.
† BART O'GARA, PH.D.
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May 3, 2018

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

Re: Supporting information for applications PRT 84787C and PRT 78392C

Dear Ms. Barry:

Enclosed please find information to further support the enhancement generated by regulated hunting for two import permit applications that we believe have been assigned to you.

- The first, PRT 84787C, is hunting with Martin Pieters Safaris in Zimbabwe. Mr. Pieters responded to some questions about the anti-poaching and community benefits generated by hunting in the Matetsi Safari Area. Please consider this information in making a positive enhancement finding for this applicant, and please consider the Non-Detriment Finding submitted by the Zimbabwe Parks and Wildlife Management Authority (October 2016), which provides information about the benefits of regulated lion hunting in Zimbabwe's Safari Areas.
- The second, PRT 78392C, is hunting with Gary Duckworth in Save Valley Conservancy in Zimbabwe. We have previously submitted extensive information about SVC, but the operator has provided more. Among other things, this information demonstrates the operator's commitment to habitat conservation and anti-poaching, and the scientific process employed in ensuring healthy wildlife populations and sustainable use. Please note, the operator has also provided more specific information about the location of this hunt (e.g., GPS coordinates and the closest city). He has also provided the PH name. This was not initially provided because this applicant submitted the application prior to release of the new forms. Finally, the operator has corrected the "shipper" for what was question 4 and is now question 8 (the name and address of the person or business shipping the trophy). Would you please substitute this corrected information in place of Mr. Duckworth's name when the final permit is issued. Please let me know if you have questions, and please consider the enclosed information in making a positive enhancement finding for this applicant.

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

Sincerely,

Regina Lennox

CC: Acting Chief, Branch of Permits

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

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mar 30 2018 2:00:00; Acknowledgement letter for Permit No. "84787C""

Eubulus Ker(b) (6) Fri, Mar 30, 2018 at 4:07 PM
To: "regina.lennox@conservationforce.org" <regina.lennox@conservationforce.org>, "cf@conservationforce.org" <cf@conservationforce.org>

FYI
Sent from my iPhone

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Date: March 30, 2018 at 11:00:03 AM PDT
To: (b) (6)
Cc: <permits@fws.gov>
Subject: Mar 30 2018 2:00:00; Acknowledgement letter for Permit No. "84787C""
Reply-To: <permits@fws.gov>

EUBULUS(b) (6) KERR(b)
(b) (6)
SHREVEPORT, LA(b) (6)
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 03/30/2018; check number 360 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA84787C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

enhancement details

Martin Pieters (b) (6) Wed, Apr 11, 2018 at 9:45 AM
To: regina.lennox@conservationforce.org
Cc: aaron Baker (b) (6), Aaron Baker (b) (6), "Eubulus Kerr (b) (6) (b) (6)

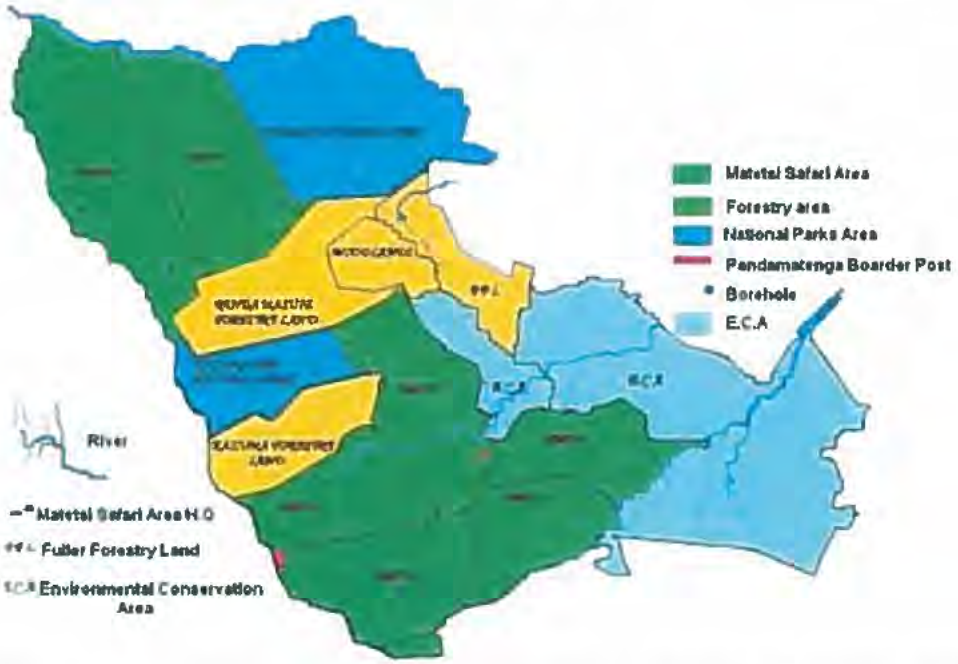
Dear Regina

Sorry for the delay.
I actually have two USA clients hunting lion, Aaron baker (b) (6) actually he has hunt shot his lion with me and will be in touch) and Eubulus Kerr (b) (6)

Both lions will be hunted in the MATETSI region which is a controlled hunting area governed by the Zimbabwe National Parks and Wildlife Authority.

1.

MAP II: MATETSI SAFARI AREA SHOWING THE SIX HUNTING UNITS, KAZUMA, PANDAMASUIE AND ICA.



2. The wildlife authority has all its own reports as they are in contra of the Matetsi safari areas.

3. The ZNPWA have been in control of the Matetsi safari areas for over 40 years and does all its own armed anti poaching as well as community assistance on its boundaries

4. For periodic reports, the ZNPWA would have all those documents.

5. Arial surveys and 48 hour game counts are conducted annually in the Hwange national park which lies

adjacent to Matetsi safari area and forestry hunting blocks.

6. Armed rangers are paid by the department of national parks and they get rewarded for successful apprehension of poachers.

7. It is a safari area hence no villages actually live in the area, the villages surround the hunting area and they benefit fro meat and off take from hunting clients which benefits them through the successful CAMPFIRE program.

8. Zimbabwe has a minimum age of 5 years with penalties to safari operators and professional hunters if an underage animal is shot.

9. Hwange National park which adjoins the matetsi block has a dedicated research team and many collared lion for research purposes. The lion population has increased dramatically over the last 5 years due to minimal quotas, successful ageing and community involvement.

10. Matetsi safari area is home to the one of the largest free ranging herds of elephant and buffalo in Zimbabwe. There are no fences and it adjoins hwange national park and Botswana where unrestrained movement of wildlife occurs.

Regards

Martin

Martin Pieters
www.martinpieterssafaris.com
(b) (6) [redacted]

DISCLAIMER: The information in this message (and any attachments hereto) may be confidential and protected from disclosure. If the reader of this message is neither the intended recipient nor an agent responsible for delivering the message to the intended recipient, you are hereby notified that any unauthorized disclosure of this information is strictly prohibited. Any unauthorized disclosure may cause the breaching party to be liable for damages. If you have received this message in error, please notify the sender by replying to the e-mail message, and delete it from your computer without reading it or saving it in any manner.

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""

3 messages

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: "Regina A. Lennox" <regina.lennox@conservationforce.org>

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Subject: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""
Date: February 26, 2018 at 11:30:01 AM MST
To: (b) (6)
Cc: <permits@fws.gov>
Reply-To: <permits@fws.gov>

ERIC M. JANDE
(b) (6)
PARKER, CO (b) (6)
U.S.A.

Thank you for submitting an application to the U.S. Fish and Wildlife Service. The application was received by the Division of Management Authority on 02/26/2018; check number 5497 accompanied the application for AFRICAN LION. Your application has been assigned the following PRT identification number: MA78392C-0

While processing time may be less, you should anticipate a minimum of 30 days to process your request, with many requests averaging between 60 to 90 days due to some requests which need to be published in the Federal Register and/or be reviewed by other Service offices.

While we are aware that you may want to inquire about the status of your application, we request that you allow our office at least three weeks after the receipt of this letter to make any inquiries. If you have additional information that needs to be provided, please mail information to DMA, Branch of Permits MS: IA, 5275 Leesburg Pike, Falls Church, VA 22041 by fax 703-358-2281 or call our staff on duty at 800-358-2104.

Regina A. Lennox <regina.lennox.cf@gmail.com> Fri, Mar 23, 2018 at 9:51 AM
To: cf@conservationforce.org

Could you possibly call and get the legal examiner's name and email for this person? Thank you!

Begin forwarded message:

From: Eric Jahde (b) (6)
Date: March 22, 2018 at 1:24:56 PM CDT

> **To:** "Regina A. Lennox" <regina.lennox@conservationforce.org>
> **Subject: Fwd: Feb 26 2018 1:30:00; Acknowledgement letter for Permit No. "78392C""**

[Quoted text hidden]

John J. Jackson, III <cf@conservationforce.org> Mon, Mar 26, 2018 at 11:34 AM
To: "Regina A. Lennox" <regina.lennox.cf@gmail.com>

Case manager, biologist

Name: Ann Barry

Email: Anna_barry@fws.gov

Sorry. Called them back this morning. They never returned my call. - AT
[Quoted text hidden]

--

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

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Mokore Safaris Lion Hunt

1 message

Eric Jahde (b) (6) Thu, Mar 22, 2018 at 1:24 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

Hi Regina,
This is the forward of mailing from Gary Duckworth with proper info as we discussed. I will also forward the PRT mailing from the government.
Thanks very much for your help and please contact me at any time if I can help.
Regards,
Eric M Jahde
(b) (6)

Begin forwarded message:

From: Eric Jahde (b) (6)
Subject: Fwd: Mokore Safaris Lion Hunt
Date: March 21, 2018 at 5:26:00 PM MDT
To: Eric Jahde (b) (6)

Begin forwarded message:

From: "Gary Duckworth" (b) (6)
Subject: RE: Mokore Safaris Lion Hunt
Date: March 8, 2018 at 8:41:56 PM MST
To: (b) (6)
Cc: "Rob Oostindien" (b) (6) "'Neil Duckworth'" (b) (6)

Good morning Eric,

I hope this finds you well and being successful with your application. I see a recent ruling by USFW is favourable. I thought to send you some information that may help with your application. Sorry I didn't send before but forgot I had these. I have attached some notes that I had written up before. Also attached are our leopard data from Mokore just to show our healthy predator population and also the data we use to try and ensure we judge the lion's age correctly from our trail camera pictures. Also a copy of our PH rules sent to any PHs operating in our areas showing the seriousness we have to ensuring the right animals are harvested. Don, do you have any more recent counts on the SVC lions. I think he last year's count was 225. Still 75 lions above what our ecologists say is

sustainable. I have also copied in a document Neil did on Conservation Through Hunting which shows our companies dedication to these areas even though this is for Mozambique it is our company MO.

Answers that you may need from the permit application if not already done:

1. Page 3, #5 a and c.
2. Page 4, #8.
3. Page 4, #9 a, b, and c.

Page 3 5a) Mokore and Umkondo Ranches, Save Valley Conservancy, Bikita District, Masvingo Province. South Eastern Lowveld. Closest cities Masvingo and Mutare. Mokore Camp – S 20 24' 12.01" E 032 07' 01.88"

5c) Mokore Safaris, Gary or Neil Duckworth as PHs. Gary PH license number 96. Neil PH license number 94.

Page 4 8) Name: Cuan Meredith
Company: Trophy Consultants International
Address: 4 Josiah Chinamano Road, Belmont
City: Bulawayo
Province: Matabeleland
Country: Zimbabwe

9a) Please see attachments
9b) Please see attachments
9c) Please see attachments

I hope this all helps. Good luck.

From: Gary Duckworth (b) (6) [redacted]
Sent: Thursday, February 15, 2018 4:12 PM
To: (b) (6) [redacted]
Cc: (b) (6) [redacted] 'Rob Oostindien'
Subject: RE: Mokore Safaris Lion Hunt

Hi Eric,

Thank you. Lynn will send you a list of things she needs for processing permits, etc. Good luck with the permit.

From: (b) (6) [redacted]
Sent: Wednesday, February 14, 2018 4:50 PM
To: Gary Duckworth
Subject: Re: Mokore Safaris Lion Hunt

Thank you Gary,
My application is in the works with John Jackson's help. I will wire the deposit to your account here in Mississippi today for the lion hunt in October 2018. Is there any other paper work that I need to start with you?
Eric Jahde

Sent from my iPhone

On Feb 14, 2018, at 7:35 AM, Gary Duckworth (b) (6) [redacted] wrote:

> Good afternoon Eric,
>
> I hope this finds you well. Rob had asked me to assure you that should you not get the import permit for the lion into the USA that we would either return your deposit to you or allow you to roll it over to another year or safari. All deposits are held in an account in Mississippi with our agents at African Horizons. Should your application be turned down for the import of the lion then they (African Horizons) can easily return your deposit should that be your wish. Looking at the fish and game website I am fairly confident that your application should have a positive outcome especially since the Save has not only enough lions, but possibly too many! Please do not hesitate to contact me should you have any further queries.
>
> <image001.jpg>
> <image002.jpg>

10 attachments

Kind regards

Gary Duckworth

Mokore Safaris
7 Stable Close,
Borrowdale, Harare
Zimbabwe

Phone +263-(0)4-883462
Mobile +263-(0)772 260-178
skype gary.duckworth3
www.mokoresafaris.com
www.mokoreecosafaris.com

image001.jpg
30K

image002.jpg
6K

Habitat Enhancement Report- Mokore Safaris Zimbabwe.docx
20K

Leopard Data.pdf
3571K

aging_the_african_lion.pdf
5125K

Mokore Safaris PH Rules.pdf
176K

SVC Predators 2015.docx
26K

Zimbabwe Rates 2018.pdf
508K

AN EXAMPLE OF CONSERVATION THROUGH HUNTING [5741].docx
9659K

USFWS Lion Permit App.pdf
70K

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

Leopard Data 2015/2016

Mokore and Umkondo Ranch

Savé Valley Conservancy

Introduction

Leopards (*Panthera pardus*) are found throughout Mokore and Umkondo Ranches with in Savé Valley Conservancy (SVC). Mokore Safaris has been hunting leopard for numerous years as a form of trophy hunting or sustainable utilization. Trophy hunting consists of targeting mature male individuals, and as of more recent, individuals aging older than approximately four (4) years in age. The purpose of this document is to identify randomly selected bait sites and the leopards identified at these specific bait sites.

Method

The Professional Hunter or individual tasked with pre-baiting or baiting for leopard chose a randomly selected bait site in attempt to lure a male leopard into feeding. Due to the fact that females also utilize bait sites, records on any females feeding are also monitored. The selected bait sites are randomly chosen throughout Mokore and Umkondo Ranches. Camera traps or trail cameras are then placed at all bait sites. For identification purposes, it is attempted that all leopards captured feeding with the camera placed in such a manner that the right side of the leopard is photographed. This is however not always possible due to preferred bait site selection. It is thus recorded which side of the leopard pictures are taken of.

Male leopards are given names that aid in either easily identification of the cats or are named as per the bait site that they initially feed on. Females were named simply by property and in numerical order. For example, a female leopard feeding at the Gwezi River bait site on Mokore would be named MF001. If this female had a cub feeding alongside her, the cub would be named MJ001 and would have a recording that the cub belongs to MF001. Where MF is Mokore Female and MJ is Mokore Juvenile. The sex of each leopard was also recorded. For all juveniles the sex is recorded as unknown due to difficulties in identifying sex at a young age.

Photos are saved of all cats recorded either a right side, left side or both sides where possible. If a cat was found feeding on a different bait site, this was also recorded. An estimated age was also assigned to each male that was found feeding. The age was estimated using the Panthera ageing guidelines as well as PH age estimations.

Image 1: Randomly selected bait sites throughout Mokore and Umkondo Ranches.

Results

Due to the fact that Mokore Safaris utilize two (2) properties, the data is classed into two groups, namely Mokore Leopard and Umkondo Leopard. A total leopard population is also determined due to the fact that holistically the same company treats these blocks as one management unit. It is to be mentioned that the data is based on some of 2015 and all of 2016 hunting season. Majority of the data for 2015 produced errors upon processing. However some data is made available on leopards being taken and locations thereof.

Mokore Leopard

The data gathered for Mokore is based on information gathered by randomly selected bait sites as mentioned above. It can be noted that a large portion of Mokore went without being baited, close on 2 000 ha. For the purpose of this document, this 2 000 ha was not excluded from the total area. It is hypothesized that this will have an effect on the total leopard numbers as well as leopard densities found on Mokore Ranch.

All data is separated into two classes, namely pre and post hunting. It is deemed that other males who in turn will occupy the available territory replace males removed from Mokore.

A. Pre-hunting leopard numbers and densities

Mokore Ranch is approximately 7 841 ha in size. A total number of fourteen (n=14) leopard were identified on seven (7) bait sites throughout Mokore. It can be noted that a total number of five (5) bait sites fell in close proximity to the Turgwe River. As previously mentioned, the centre and north-eastern area of Mokore was found free of baits. This does however not mean that no leopard utilize this area. A total number of five (5) males, six (6) females and three (3) juveniles were identified on Mokore.

Densities of Mokore resulted in 560 ha/leopard. Males had an average density of one (1) male per approximately 1 568 ha. Females and Juveniles having an approximate density of one (1) individual per 871 ha.

B. Post hunting leopard numbers and densities

For the purpose of the document, it is concluded that a total number of two (2) male leopards were removed from the population in 2016. This in turn results in a lower density of male leopard for Mokore. This density being approximately 1 000 ha larger per male in post hunting than what it was in pre-hunting conditions. It can however again be mentioned that these available territories will become occupied by other males moving into the area.

Umkondo Leopard

The data collection for Umkondo is done in the same manner as on Mokore. It can also be noted that on Umkondo, no bait sites were place within an area of approximately 1 300 ha in size, namely around the Mokore River west of the main road. This area is adjacent to that of the area that was not baited on Mokore Ranch.

A. Pre-hunting leopard numbers and densities

Umkondo Ranch is approximately 6 736 ha in size. A total number of eleven (11) leopards were identified on six (6) baits throughout Umkondo. A total of number of four (4) males were recorded, five (5) females and two (2) juveniles. A total density of approximately one (1) leopard per 612 ha presented itself on Umkondo. Males had an average density of 1684 ha per individuals. Females and Juveniles had an approximate density of 962 ha per individual.

B. Post hunting numbers and densities

A single (1) individual was removed from the population on Umkondo Ranch for 2016. As a result of this the male density differs approximately 560 ha greater per individual post hunting.

Combined Data

Combined a total of twenty five (25) leopard were identified, with an approximate density of 583 ha per leopard. Males having an approximate density of 2 429 ha per individual and females and juveniles 911 ha per individual. This data is based on the post hunting data. Numbers and densities will change pre-hunting season 2017 depending on whether or not available territories become occupied. A large area of approximately 3 300 ha has also gone un-baited. This will also affect leopard numbers and densities especially when considering females and possibly juveniles.

Discussion

When considering data pertaining to this document it is important to note that some leopards both on Mokore and Umkondo would have been missed due to numerous reasons. Main reasons are areas being devoid of baits and the possibility of males not feeding on baits is not to be ignored. It is hypothesized that the 2017 pre-hunting season will yield higher numbers and densities of leopards, especially males.

A total number of three (3) leopards were removed from the population in 2016, two (2) on Mokore and one (1) on Umkondo.

Table 1: Identification sheet of leopards on Mokore.

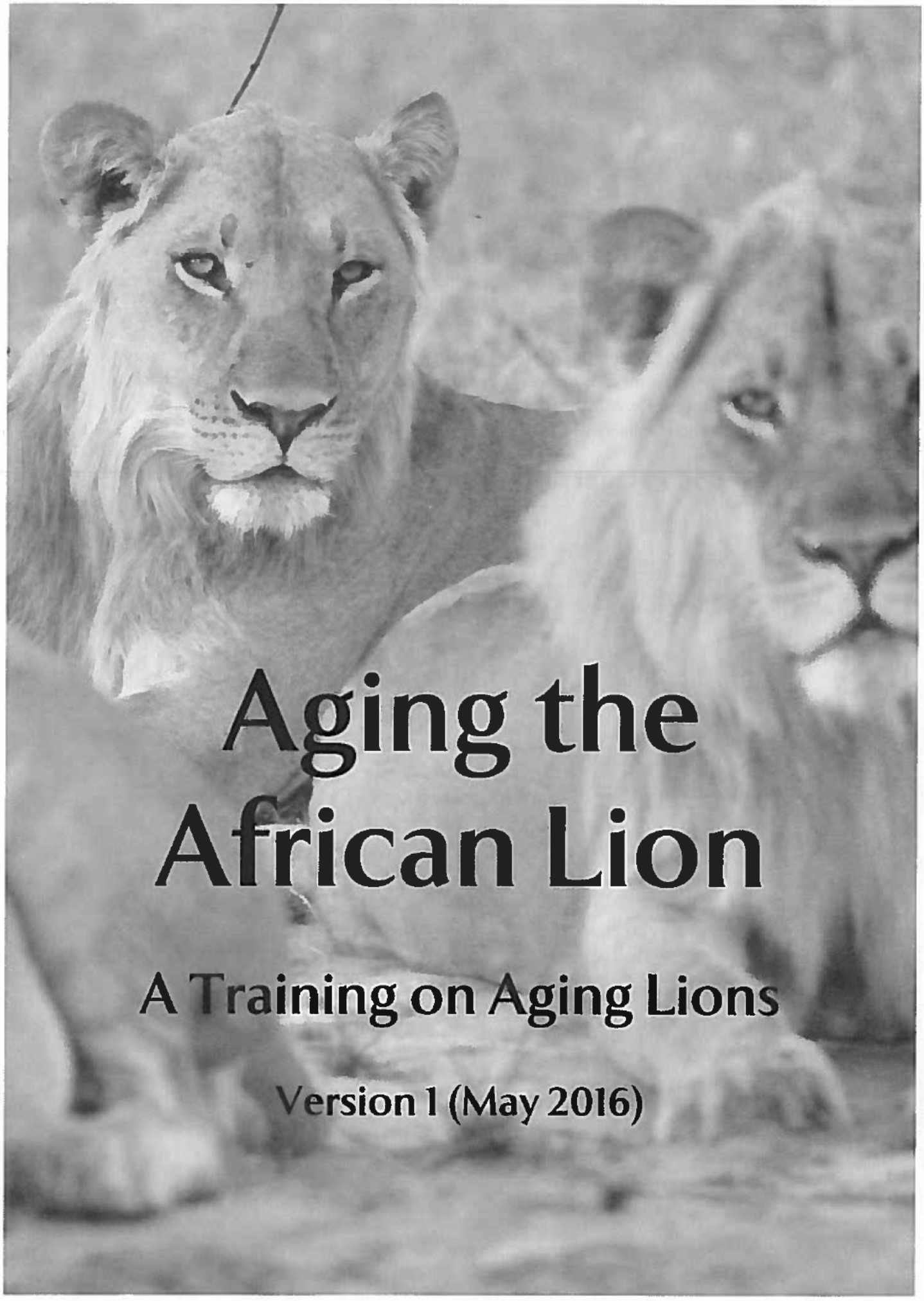
Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
Boma cat	M	3		Boma, Savuli Boundary	398805	7750153
MF001	F			Boma, Savuli Boundary	398805	7750153
JM001	Unknown		MF001	Boma, Savuli Boundary	398805	7750153
The King	M	4		Mdala Pan Bait Site	401161	7744365
Shlabata Cat	M	6		Billys Bait site	405746	7743229
MF002	F			Billys Bait site	405746	7743229
MF003	F			Gwezi Bait Site	406370	7744543
JM002	Unknown		MF003	Gwezi Bait Site	406370	7744543
2 Smile	M	3		Billys Bait site	405746	7743229
MF004	F			Mokore River, Crowned Eagles Nest	406968	7748034
MF005	F			Bow Stream	408794	7743750
Bow Cat	M	4		Bow Stream	408794	7743750
MF006	F			Majewe Weir	402133	7742862
JM003	Unknown		MF006	Majewe Weir	402133	7742862
Muchwa Cat	M	3		Majewe Weir	402133	7742862

*MF	Mokore Female
*JM	Juvenile Mokore
	Male removed from Population

Table 2: Identification sheets of leopards found on Umkondo.

Name	Sex	Estimated age of Male	Juvenile of which Female	Location	Lat	Long
UF001	F			3 spots bait site	408167	7754697
5c	M	4		Umkondo Mine Dam	410765	7752730
Zizi Dip Cat	M	4		Thierrys Bait Site	415070	7755639
UF002	F			Thierrys Bait Site	415070	7755639
JU001	Unkown		UF002	Thierrys Bait Site	415070	7755639
Dick and Balls	M	4		Umkondo/Sango Nothern Boundary	407314	7753919
UF003	F			Umkondo/Sango Nothern Boundary	407314	7753919
UF004	F			Bedford Tanks	410316	7749369
UF005	F			Torchwood Bait Site	416065	7752784
JU002	Unkown		UF005	Torchwood Bait Site	416065	7752784
3 spot	M	5		3 spots bait site	408167	7754697

*UF	Umkondo Female
*JU	Umkondo Juvenile
	Male removed from population



Aging the African Lion

A Training on Aging Lions

Version 1 (May 2016)

Background and Applications

Lions in Africa

As the dominant predator in Africa, the African lion (*Panthera leo*) is highly valued for its ecological role and importance for the tourism industry. However, lions have declined by an estimated 42% over the past 21 years (3 generations) to approximately 20,000 individuals (Bauer et al. 2015). Robust tools for assessing and managing lion population dynamics are critical for survival of the species.

Why Age Lions?

Age is a common metric used throughout the world to guide the management, research and sustainable harvest of many types of wildlife, including large carnivores, ungulates and fish. Knowing an animal's age is critical for accurately estimating key elements of wildlife behavior and life history, such as reproduction, survival, movement and population size. Our ability to successfully conserve and manage wildlife depends on how well we understand each animal's social and biological role, which is closely tied to age.

Implications for Management and Research

Managers use population models based on the age structure of a population to help predict how different management scenarios or environmental stressors might affect the future of a species. Population models project a species' population size based on information about a species' life history, including conception rate, birth rate, survival of young, age at puberty, territoriality and other behavioural characteristics. The age or life stage of an animal is closely tied to its reproduction, survival, behavior, and other aspects of its ecology that can affect population stability. Thus, an animal's age in the context of its population can provide valuable information about the future of a single population and, for threatened species like the African lion, even the species as a whole.

For this reason, age is an important metrics collected by lion researchers. For example, researchers that collar individual lions must be able to accurately age the lions they study in order to understand lion behaviour in a broader context. Ensuring that lions have the natural resources and the protection that they require at different phases of their lives is critical for ensuring their conservation.

Importance for Sustainable Hunting

Lions are the only social big cats in the world. Each pride consists of 4-5 adult lionesses, their dependent cubs, and a temporary coalition of pride males. Pride males play a key role in defending their pride against invading males by forming coalitions of 2-3 males to defend the pride territory through roaring, patrolling, scent marking and aggressively approaching invading males. When new males enter a pride, they often kill cubs (a behavior termed "infanticide") in order to bring lionesses into estrus more quickly so they can produce offspring. Infanticide

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

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

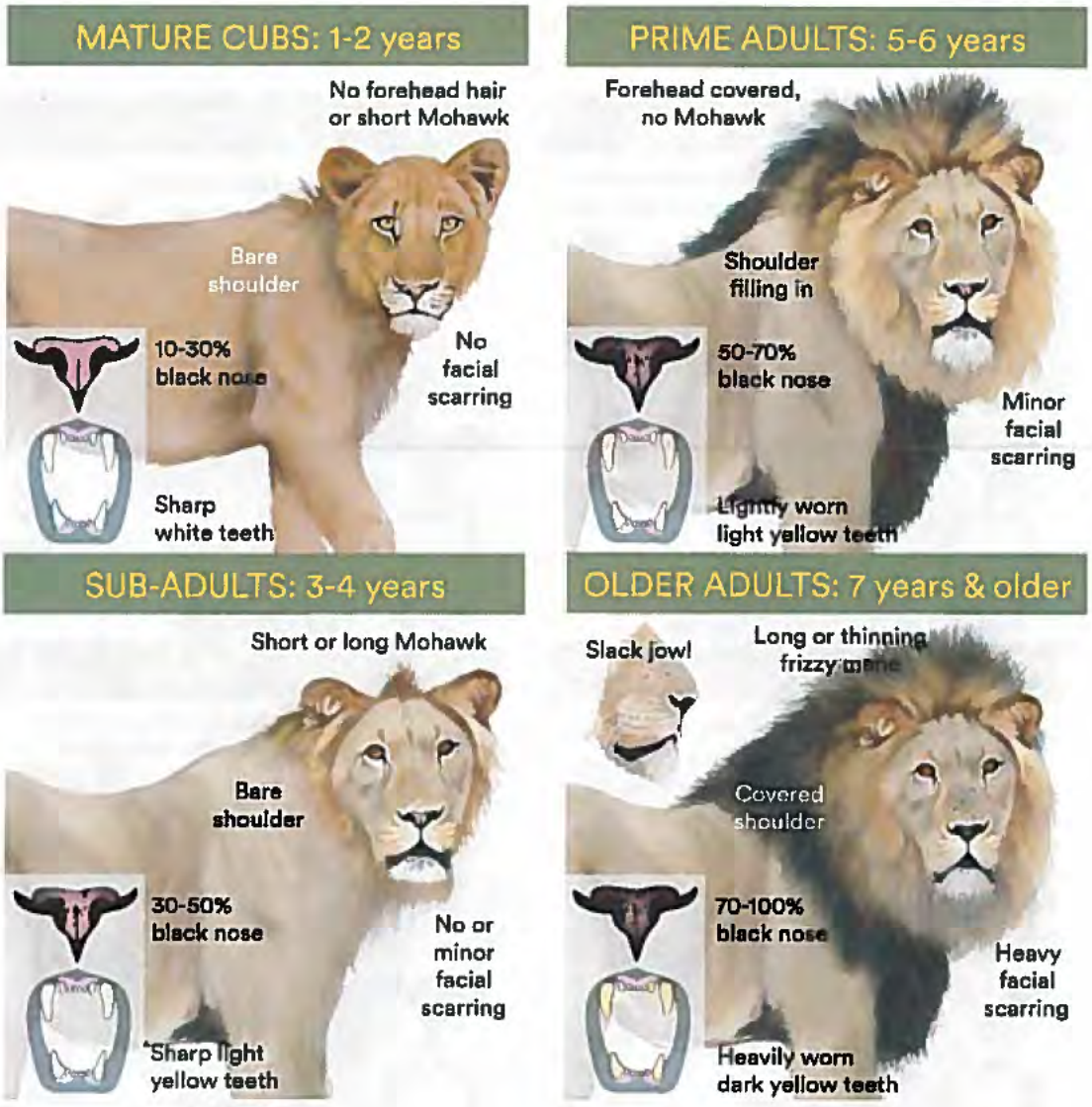
After You Finish: Re-Test Yourself

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

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



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

Mokore Safaris PH Rules

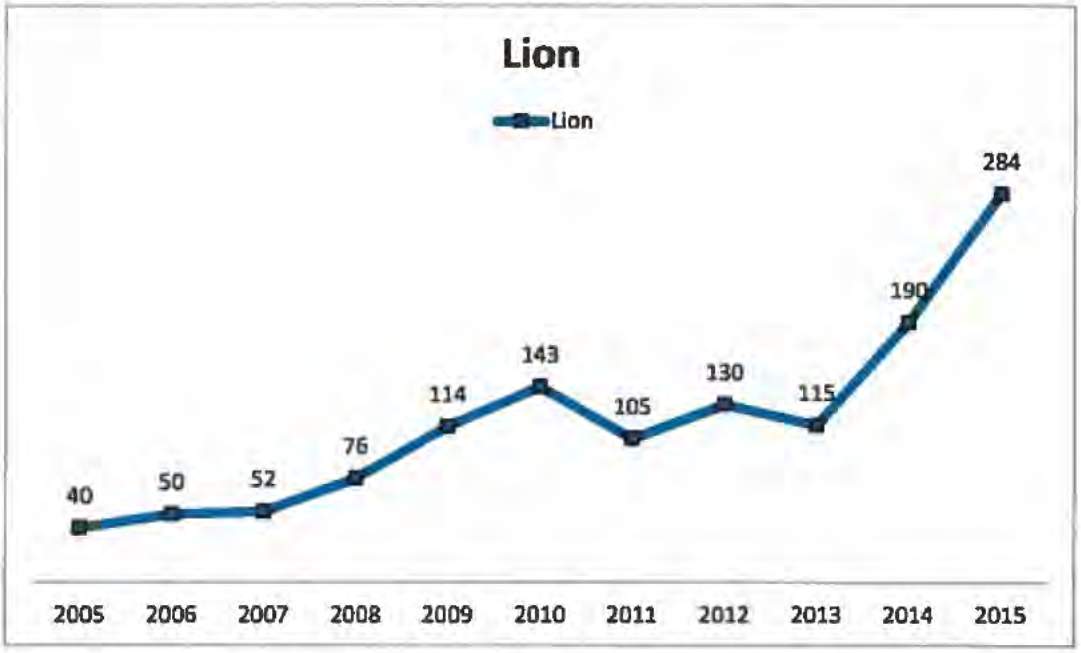
1. Fuel – All incoming PHs must refuel in the last available garage on the way in and then again on the way out. The receipt from the way out is to be handed in at Mokore Safaris offices for a refund. Please do not arrive in camp with empty tanks and then expect to be refuelled before leaving. For Save 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 skinners 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. 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

SVC Predators 2015

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:



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

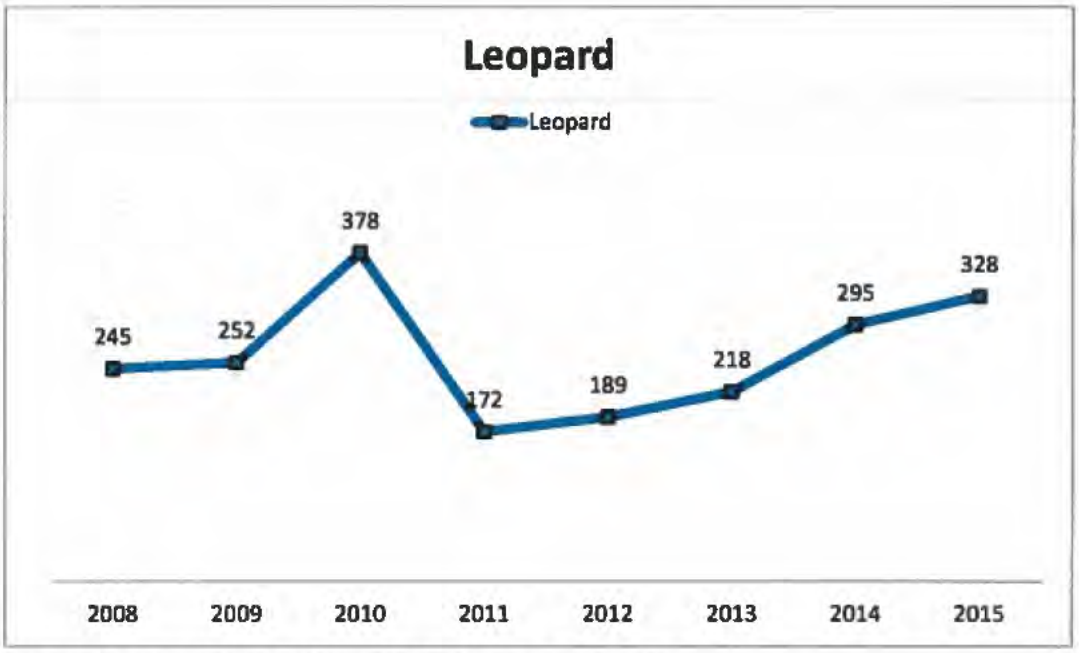


Image 2: Population trends of Leopard for the SVc from 2008 to 2015.

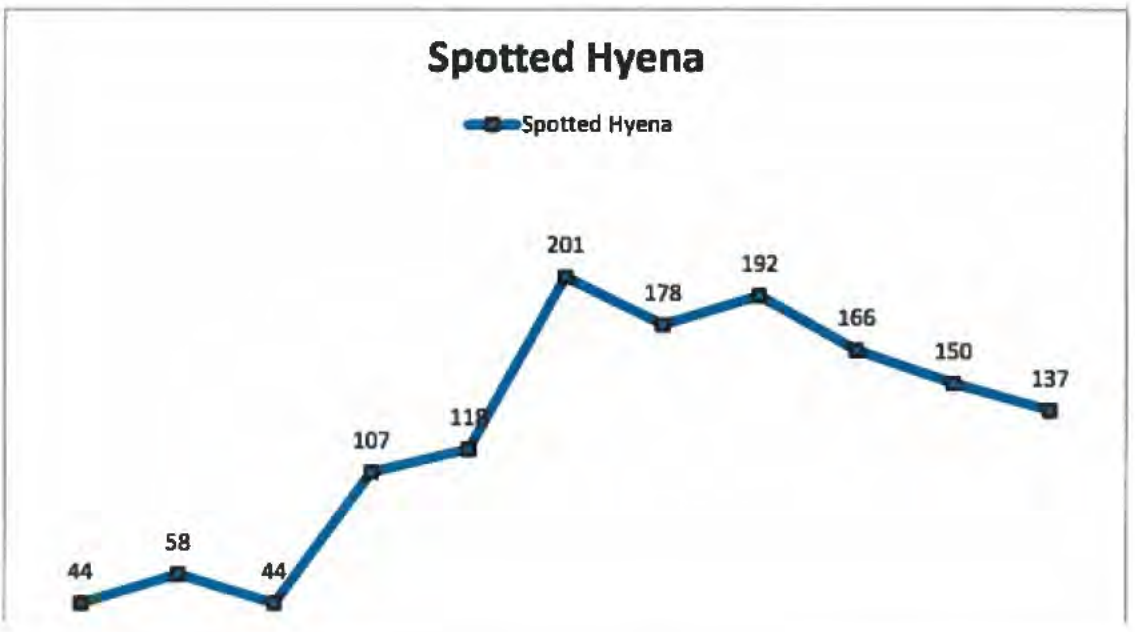


Image 3: Population trends for Spotted Hyena of the SVC from 2005 to 2015.

Mokore Safaris - African Horizons Inc. Price Guideline for 2018

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 - $1,500/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	15,000.00	Zebra Bait (Mokore only)	500.00
Lion	15,000.00	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

ANOTHER FINE EXAMPLE OF CONSERVATION THROUGH SUSTAINABLE AND ETHICAL HUNTING.

Prior to 2002, Coutada 9, like all other wilderness areas in Mozambique, had been through over 25 years of civil war and rampant poaching. This massive area (4333 square kilometres) was left virtually devoid of wildlife. Furthermore, the area suffered serious habitat destruction, being subjected to annual late season bushfires and the indiscriminate cutting of trees through "slash and burn" agricultural practices. In 2002, Rio Save Safaris, took over the concession and set out to re-habilitate the area to its former glory. Firstly, they needed to take control of the massive poaching epidemic and provide surface water for the very limited remaining wildlife.

Over the past 13 years RSS has drilled 22 boreholes and constructed 12 large dams, these provide permanent surface water for the wildlife in Coutada 9. This water is essential for life and all species benefit, including birds, smaller mammals as well as insects. The construction of these dams has been a lengthy and expensive exercise.

Some of the completed dams on Coutada 9 creating permanent surface water for the wildlife.

Since 2003 RSS anti-poaching teams have consistently removed over 1000 gin traps per year, caught on average 150 poacher per year and confiscated numerous homemade muzzle loader rifles as well as a few modern assault weapons like AK 47's from poachers. For EVERY weapon confiscated, poacher apprehended or trap removed RSS have paid an incentive bonus to the anti-poaching units. Due to these continuous efforts, the wildlife has thrived and flourished, to the stage where most populations have reached sustainable population densities.

A year's haul of traps and guns with some of RSS anti-poaching game scouts.

An elephant bull poisoned by villagers where nothing from the animal was utilised and one of the 150 poachers arrested annually by RSS anti-poaching units with his traps. Most poaching is done for commercial use and totally unsustainable.

Some species populations, however were so low that RSS set out to re-introduce these species. Not a small feat in itself considering no importation of wildlife or inter-area game transfers had ever taken place in Mozambique.

After 18 months of tireless negotiations, RSS imported 10 lions in September 2009 from Phinda Game Reserve in South Africa. They were transported and successfully released them into Coutada 9 over 1600 km away. They have settled and are breeding well in the coutada.

Waterbuck numbers, a species that once thrived in Coutada 9, were down to a mere handful after the civil war. RSS made a deal with Gorongosa National Park to swop 20 Zebra and 40 eland for 146 waterbuck. GNP got to increase their eland and zebra populations and C9 received 146 waterbuck in September 2013. Waterbuck are now seen daily and breeding well.

Eland from Coutada 9 being released into Gorongosa National Park and the replacement Waterbuck into C9.

Waterbuck and eland successfully released .

A key priority from the outset, was to boost the local remnant buffalo population and after more than 10 years of trying to source buffalo from surrounding countries as well as within Mozambique. RSS was FINALLY granted permission from the Mozambique government to capture 50 buffalo as a trial from the Zambesi Delta reserve. This was finally achieved in 2015. The 50 buffalo are safe and sound in Coutada 9 with plans now to capture a further 250 next year.

The first 50 buffalo in their quarantine bomas, November 2015.

These projects and all other developments such as building of road networks, Safari Camps and staff accommodation to date have been funded through trophy hunting. RSS operates on a strict sustainable offtake quota where a small percentage, normally 2-5% of a population, is harvested. These animals are usually males past their prime and their removal has little impact on the overall species population.

All funds raised through trophy hunting to date, have gone back into the conservation and development of this magnificent area as well as to support the local communities. Unfortunately due to the remoteness of the concession and thick bush, photographic tourism is very limited and not a feasible option for this area.

RSS employ 50 game scouts for anti-poaching alone as well as another 60 plus people for all other development work required. This in turn provides over 100 families with a reliable source of income and food annually.

Of the animals harvested 25 % of the trophy fee received from foreign hunters goes directly to the local communities. RSS also supplies most meat to the community either directly through delivering it to the local villages or indirectly through issuing it to the staff working within the Coutada. The meat from ALL animals harvested is FULLY utilised, including lions, baboons and especially elephant.

RSS has also built a school, clinic and drilled boreholes for the surrounding communities. Many of our hunting clients have made donations to the school personally or in the form of delivering SCI Blue Bags.

Poaching, as opposed to legal trophy hunting, is indiscriminate, without regard to age, sex or species of animals killed. There is no respect for boundaries or numbers of animals harvested and if not constantly policed there WILL be no wildlife left. The general modus operandi of the poachers in this region is hunting with homemade gin traps or snares which is very cruel. When RSS initially arrived in Coutada 9 almost every animal harvested by hunters was missing a foot from these traps.

Basically, the animal once trapped will drag the trap around for 3 -4 days until the poachers catch up to it and kill it with an axe or spear. Some species such as lion, buffalo, leopard and elephant that they cannot kill due to the danger aspect with their axes are left to drag these traps around for weeks until the animal dies either from starvation or from infection. Sometimes the animal's foot rots, breaks or is bitten off. These survivors are then crippled for life, or slowly lose condition and die.

One male lion had three of its four limbs injured from traps. Thanks to hunter supported anti-poaching efforts there are far fewer cases of injured animals but still a massive and continual problem.

An eland with a trap on that escaped the poachers with two axes embedded in it and a baby elephant that had to be put down after dragging this trap for over a week.

A buffalo cow that was caught in a trap that was put down after a week and one of several elephant poached annually for their ivory.

A mature lioness and a sub adult lioness that both died from these traps.

A young male lion that was caught with a trap, after a week it's foot rotted off and is now walking around with only 3 feet.

The illegal cutting of hardwoods for planking is another massive problem and the RSS anti-poaching team is heavily involved in trying to protect all the beautiful hardwoods on Coutada 9.

The only donations received to date have been from the hunting organisations, Dallas Safari Club and Safari Club International. RSS would like to thank them both for helping us save the animals and habitat on Coutada 9.

A massive THANK YOU to all the hunters who in following their passion for adventure in wild Africa. Have saved thousands of animals in Coutada 9, provided employment and income for many families as well as fed thousands of local villagers over the past 13 years. None of the animals pictured here have names but hunters are the ONLY ones fighting to save these remote and wonderful areas and their wildlife. Your continued support of sustainable hunting is greatly appreciated.

Pictured above is 1306 gin traps, 68 cable snares, 9 can rat traps and 25 homemade muzzle loaders that were collected by our RSS anti-poaching team in 2015 alone. This anti-poaching effort alone costs RSS over US$100 000 annually, all of this comes from sustainable hunting.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Delamarter	Harold	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Brush Prairie	WA	(b) (6)		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)

04/23/2018

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.

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

Harold Delamarter, (b) (6) [redacted]
(b) (6) [redacted]

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?

XXX 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo Melanochaita (sub species) Lion

b. Sex (if known).

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:

b. Date wildlife is to be hunted:

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

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:

Tanzania, Selous Game Reserve

b. Date wildlife was hunted: October, 2016

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

Luke Samaras Safaris LTD, PO Box 3483, Dar Es Salaam, Tanzania

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]:

Erasmia, Pretoria, South Africa

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).

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: Paula Fernandes
Business Name: Oxi Logistics (PTY) Ltd
Address: Farm 354, Hennospriver
City: 0023 Pretoria Gauteng, South Africa
State/Province:
Country, Postal Code:

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?

No

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?

N/A

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

No

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

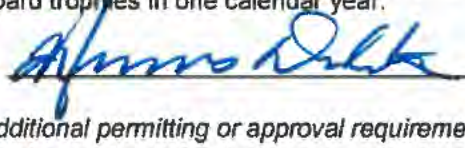
10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

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:  Date: 04/23/2018

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).

Portland OR
(b) (6)
Portland OR (b) (6)
(b) (6)

[redacted] (b) (6)

U.S. BANK NATIONAL ASSOCIATION
19-10/1250

[redacted] (b) (6)

April 25, 2018

PAY TO THE ORDER OF US Fish & Wildlife Service $ 130.00

One Hundred Dollars & no/100 DOLLARS

MEMO

[redacted] (b) (6)

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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Schnetzler	Christopher	R	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Powell	Ohio	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. 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) 01/17/2019

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 a trophy 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 4-6 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.

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

Amy Wicklund Phone (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera leo leo

   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:

   b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Country-Zimbabwe, Province-Masvingo, Conservancy-Save Valley Conservancy, Area-Humani Ranch, coordinate where lion was harvested- 36k 143 280, Nearest City- Chiredzi

   b. Date wildlife was hunted:

10-12-2018 through 10-27-2018 Lion was harvested on 10-19-2018

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

Name of Safaris Outfitter- Tredelk Safaris Name of Safaris Company- Tredelk Safaris. Name of professional hunter - Guy Whittall- Professional hunter number 421

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 foreign export/re-export document]:

Trophy Consultants International 4 Josiah Chinamano Road Belmont Bulawayo Zimbabwe

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). See attached.

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:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo Zimbabwe
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Please see information included with application

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, local community, or government?

Please see information included with application

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see information included with application

OMB Control No. 1018-0093
Expires 08/31/2020

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: _____ Date: 01/17/2019

    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 governments 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 shipments 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).

Please use New York, NY Port

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 9 October 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Tredelk Safaris who have applied for a permit to hunt 1 x lion with client **Chris Schnetzler** in the following property:

- Humani and Bedford in Save Valley Conservancy Masvingo Province

The hunt will be **from 12 October 2018 to 26 October 2018**under the guidance of professional hunter G. Whittal PH license number 421.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~ 9/10/18

Investigation and Security Manager **Date**

Approved/ Not ~~Approved~~: 10/10/18

Head Management Services **Date**

For and on behalf of the Director General

Question 9b

9 b.

- The trophy fee on the lion is US$15,000.00 of this US$5,000.00 is paid to Zimbabwe Parks an Wildlife Authority.
- The operator (Tredelk Safaris) pays Zimbabwe Parks and Wildlife Authority the gazetted license fees for all trophies hunted.
- The operator (Tredelk Safaris) pay a further 15% of the government gazetted trophy license fees to the Zimbabwe Parks and Wildlife Authority.
- The operator bought the Humani on the Auction in december of 2014 for 5 years with the option of renewing for another 5 years. The sale of the auction is paid to Zimbabwe Parks an Wildlife Authority.
- The Zimbabwe Parks and Wildlife authority are responsible for the welfare of the community through license fees,15% of the annual quota allocated and the Auction price paid by the operator.
- The operator is then responsible for all the anti poaching, water management and wildlife management.

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081272
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Tredelk Trading (Pvt) Ltd	Client's Full Name	Chris Schnetzler
ZTA (HOP) No.	HOP0304	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	11 Hazeldene Road Borrowdale Harare	Address	(b) (6) Powell ,Ohio
Name of Professional Hunter	G WHITTAL	Licence No.	421
Telephone		Fax	N/A
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	Address	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Humani	Masvingo	
2	Mkwasine Cent Ext	Masvingo	
3	Bedford	Masvingo	
4	Senuko 2	Masvingo	
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	12-10-2018
Date of Safari To	26-10-2018
Daily Rate Charged For Big Game USD	1,400.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	21,379.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	18,950.00
Other fees (Incidentals)	1,230.00	Grand Total USD	41,559.00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	LION	M	Killed	Humani	36k143280	20-OCT-2018	24 7/8"	15,000
2	GIRAFFE	M	Killed	Humani	36K383895	14-OCT-2018		1,500
3	GIRAFFE	M	Killed	Humani	36K497538	12-OCT-2018		1,500
4	HYENA	M	Killed	Humani	36k175425	21-OCT-2018		850
5	IMPALA	M	Killed	Humani	36K339142	16-OCT-2018	48"	100
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Lion Hunting in Zimbabwe's Savé Valley Conservancy
A Conservation Success Story

Dr Rosemary Groom
African Wildlife Conservation Fund

1 Background

This document is a case study of the Savé Valley Conservancy in south-east Zimbabwe, where the African lion (*Panthera leo*) population is increasing exponentially, and where lions have been hunted since 2002. This case study clearly illustrates the positive conservation benefit that trophy hunting of lions can have for the species, and briefly describes the importance of hunting to maintaining wildlife in the area.

2 History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900s, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting "battle" ensued against the wildlife, especially against all predators.

After the Second World War, cattle prices soared to new heights, and the 1950s were years of development and expansion for the cattle industry. The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980s, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, proposals were drawn up to form what would have been known as the Savé Valley Intensive Conservation Area (du Toit 1989). The initial focus of the proposal was to create a single large wildlife area, especially for the re-establishment of endangered species and species that had been overexploited in the past. Cattle ranching would still remain the primary land use option with wildlife an additional source of income.

The formation of the Savé Valley Conservancy came in June 1991 with the signing of the first constitution by the various members. However, the following 1991/1992 rainy season proved to be the driest season ever recorded, and proved to be a deciding factor for the landowners of the Savé Valley Conservancy with regards to future land use. At a workshop held in November 1992 a decision was taken that wildlife would be the primary land use option and that all cattle still owned within the conservancy would be disposed of. This created what was at the time the largest private wildlife conservancy in the world, with 340 839 hectares included (Fig 1).

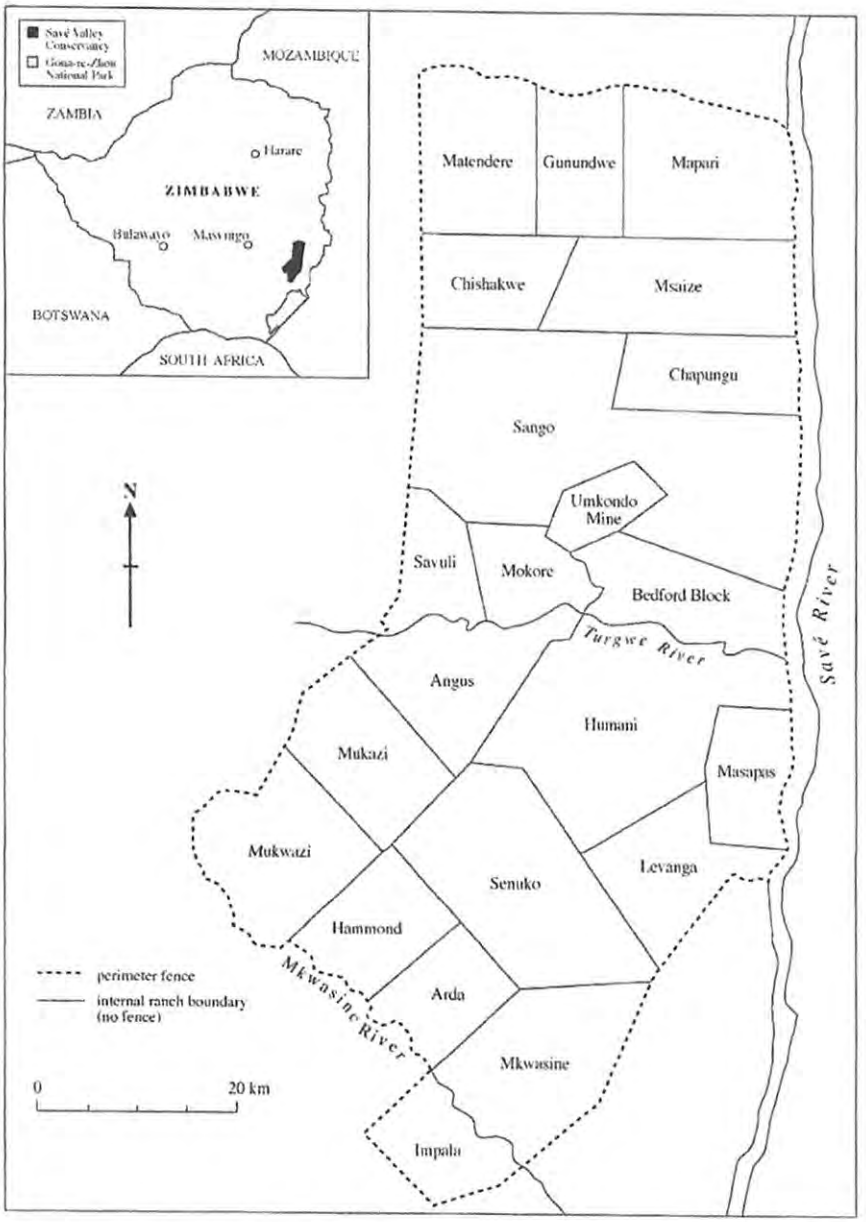

Figure 1 The Savé Valley Conservancy (taken from Lindsey et al 2008)

The conservancy members were then faced with the challenge of rebuilding the wildlife population, removal of all internal fencing, the erection of a common perimeter fence and security. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Some wildlife species had been translocated into the conservancy prior to 1991 (including black rhino, elephant, sable, eland, nyala, giraffe, waterbuck, wildebeest and zebra; Table 1). Species relocated into the SVC since signing the constitution in June 1991 include more black rhino, buffalo, elephant, eland, giraffe, nyala, sable antelope, spotted hyena, tsessebe, Lichtenstein's hartebeest, warthog, waterbuck, blue wildebeest, zebra and lion (Table 1).

Table 1: Species and the number of animals per species re-introduced into the Savé Valley Conservancy, Zimbabwe

Animal Species	Number Of Animals Re-introduced				
	Prior to October 1993	November 1993 to December 1999	January 2000 to December 2002	January 2003 to present	**Total**
African buffalo (*Syncerus caffer*)	91	88	253	40	**472**
African elephant (*Loxodonta africana*)	624	-	-	-	**624**
Black rhinoceros (*Diceros bicornis*)	-	31	-	-	**31**
Blue wildebeest (*Connochaetes taurinus*)	223	525	49	-	**797**
Burchell's zebra (*Equus burchellii*)	17	309	66	-	**392**
Giraffe (*Giraffa camelopardalis*)	36	101	44	-	**181**
Lichtenstein's hartebeest (*Alcelaphus lichtensteinii*)	-	-	-	28	**28**
Livingston's eland (*Tragelaphus oryx*)	215	263	102	-	**580**
Nyala (*Tragelaphus angasii*)	22	43	11	26	**102**
Lion (*Panthera leo*)	-	**3**	-	**10**	**13**
Spotted hyena (*Crocuta crocuta*)	-	-	-	3	**3**
Ostrich (*Struthio camelis*)	-	-	71	-	**71**
Sable antelope (*Hippotragus niger*)	49	203	122	-	**374**
Tsessebe (*Damaliscus lunatus*)	-	97	-	-	**97**
Warthog (*Phacochoerus aethiopicus*)	-	207	-	-	**207**
Waterbuck (*Kobus ellipsiprymnus*)	177	66	82	32	**357**
White rhinoceros (*Cerathotherium simum*)	-	-	-	20	**20**
TOTAL					**4349**

3 Trophy hunting vs Ecotourism in the Savé Valley Conservancy

Trophy hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, continue the re-stocking and increase the security, especially due to the now significant numbers of black rhino in the conservancy. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, doing game drives and bush walks and specializing in rhino walks and African wild dog den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

3.1 The Land Reform Program

The land reform program was launched in February 2000 and created negative press from the international community. This resulted in travel bans and warnings from most of Zimbabwe's source markets, which, compounded by the negative publicity in the media, resulted in major suppliers withdrawing their support. In the case of the Senuko Lodge, this resulted in a 98% cancelation of the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snaring (bushmeat poaching) was extreme. For example, in the following eight year

period (2001 to 2009), 10,520 illegal hunting incidences were recorded in the conservancy, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al 2011).

The associated political instability meant that the wildlife industry and ecotourism industry collapsed over-night. Sport hunting and trophy hunting became the only economically viable land use options and have remained the only tangible source of income to the landowners of the SVC.

4 Lions in the Savé Valley Conservancy

As mentioned, lions, and all other large predators were virtually or completely eradicated during the cattle ranching era (du Toit 1994, Pole 1999). Once persecution stopped, lion numbers began to pick up, but initial recovery was slow, probably because of a depleted source population. Evidence of lions were first noticed in the late 1990s / early 2000s, but were almost exclusively of males. Very few signs of females were observed until 2003, when small family groups and male-female pairs were observed. By 2004-5 there were some reports of cubs. Population recovery has been largely through natural recolonisation, although 13 lions were reintroduced between 1993 and 2005.

In 1993, three lions were brought into the conservancy by Humani Ranch; two adult females and one adult male. One of the females was pregnant and four cubs were reared successfully. A further ten lions (four lionesses and six small cubs) were brought in in 2005 and released on Sango Ranch. A few months later three were killed by wire snares, and the rest of the group split up. Tracks suggest that three adult females and one cub survived.

4.1 Lion monitoring

Lions have been monitored in the Savé Valley Conservancy since 1999 when the first survey was conducted (Pole 1999). Track index or call-up surveys were then conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom 2012). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Results of the surveys indicate that the lion population in the Savé Valley Conservancy has been undergoing exponential population increase (Figure 1; Groom 2012). Using prey availability models (Hayward et al 2007), it was calculated that the population in 2011 was only at 60% of ecological carrying capacity, and thus we can expect to see the upward trend continue unless controlled.

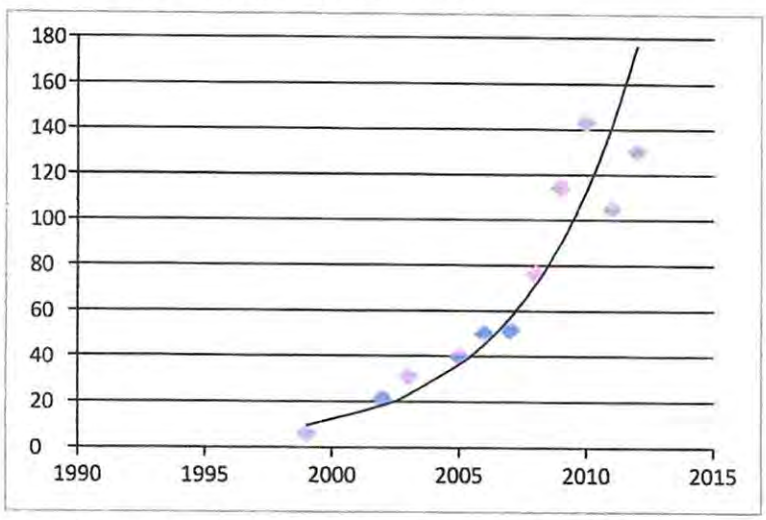

Figure 1 – Lion numbers in Savé Valley Conservancy (1999 – 2012).
Trendline is an exponential growth curve. (Adapted from Groom (2012))

4.2 Lion management plan

A professional, scientific lion management plan was commissioned by the conservancy in 2011 (Funston 2011; Appendix 1). The aim of the plan was to provide the SVC members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool, based on the evidence of good hunting practice in the conservancy. It demonstrates willingness by the conservancy to guide their hunting policy based on science and advice from professionals.

4.3 Lion hunting in the Savé Valley Conservancy

Lions have been hunted in Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 2), but with offtake never exceeding six.

Table 2 Lion quotas and offtakes in Savé Valley Conservancy from 2001 to 2011

Approved quota and success (offtake)	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Approved quota	4	5	5	1	3	3	4	6	7	7	7
Quota taken (Success)	0	1	0	1	3	3	3	3	6	5	3
Percentage success	0%	20%	0%	100%	100%	100%	75%	50%	86%	71%	43%

Despite offtakes of lions through trophy hunting, the lion population has continued to increase in the conservancy in recent years. This is largely because the lion population is still building up after the initial persecution, and trophy hunting of select, older males does not impact this growth. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; pers. obs.).

Trophy hunting of lions brings considerable revenue to the conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. A 21 day lion hunt is sold for c. $2,500 per day (prices vary slightly depending on the operator), with an additional trophy fee of $10,000. Net income from lion hunting from 2005 to 2011 (N = 26 lions) would therefore have amounted to c. US $1,365,000 in bed nights and $260,000 in trophy fees.

5 The impact of listing lions as endangered on the US Endangered Species Act

In the current political climate, landowners in the Savé Valley Conservancy have no alternative way to generate sufficient income from wildlife, other than from hunting. Lions are one of the most valuable species to the conservancy. If lions are upgraded to endangered on the Endangered Species Act in the US, the resulting ban on lion trophy imports into the US will effectively result in a collapse of the lion hunting industry in the Savé Valley Conservancy, where on average 90% of hunting clients are American (up to 98% for some properties; SVC members, pers. comm.). The loss of the c. $375,000 annual revenue will be catastrophic for the conservancy, inevitably resulting in less investment in security and other conservation measures.

Lions impose a significant cost on conservancy landowners through predation on valuable prey species that could otherwise be sold as trophies or meat. For the Savé Valley Conservancy, this was calculated as a loss of US$ 494,776 in 2009, an 8% loss relative to gross income from the species when hunted at current levels (Funston et al, unpublished data). Without these costs being offset by the income from lion hunting, landowners cannot reasonably be expected to tolerate such high lion numbers, and lion numbers would have to be reduced significantly.

The Savé Valley Conservancy is extremely expensive to run due to pressure from the illegal bushmeat trade and from rhino poaching. In recent years, robust earnings from trophy hunting have allowed investment of c. US$ 136.000 per year in ranch-based anti-poaching, ensuring that wildlife populations remained stable in all but the areas that were settled (and the heavily impacted immediately adjacent sections). An additional US$ @@@ was spent by members on a central anti-poaching unit for the battle against rhino poaching. A removal of lions from the hunting quota due to collapsed demand would reduce the ability of the Savé Valley Conservancy to protect the wildlife resource, including endangered species like its valuable populations of African wild dogs and especially black rhinos (an IUCN Key 1 population).

In the Savé Valley Conservancy therefore – and it is by no means the only area in this situation – the listing of lions as endangered on the US Endangered Species Act, and the subsequent collapse of the US lion hunting market, would necessitate a culling or contraceptive program for lions, in order to decrease their numbers to economically and ecologically tolerable levels. The upgrade would therefore, instead of protecting lions in these areas, effectively sign their death warrant.

5.1 The impact on neighbouring communities

A knock-on impact of this listing will be felt in the communities which neighbour the Savé Valley Conservancy. In 2012, conservancy members provided over US$85,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Recently the conservancy has signed a deal with the chiefs of all the neighbouring wards.....

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities.

6 Conclusion

The Savé Valley Conservancy is an excellent example of a focussed and determined effort to make a wildlife based land use viable in an otherwise cattle dominated landscape. From inception, conservancy members and international investors have invested huge amounts of finance and effort into re-stocking the area, building up the wildlife to the incredible numbers and diversity found in the conservancy today, and protecting it from poachers. The revenue to do this has been almost exclusively generated through hunting, due to the collapse of the ecotourism industry after 2000.

In recent years, lion hunts have provided a significant financial contribution to the ever-more-expensive operation of the conservancy, enabling significant investment in security and community support and engagement. Should lions become listed as endangered on the US Endangered Species Act, the resulting collapse of the lion hunting industry will have serious negative implications. The cost of having lions, both ecologically and financially is high, and with no generation of revenue from the species, numbers will inevitably have to be curtailed.

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Carnivore Densities in the Savé Valley Conservancy

Results of the 2018 Spoor Survey & Wild Dog Monitoring Project

Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

(Spoor survey carried out by Amy Wolton, Rueben Boté, and Douglas Tomwe)

Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within 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) with strong correlations existing 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 2018 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.

Methodology

The 2018 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (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 6-7km^2 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.

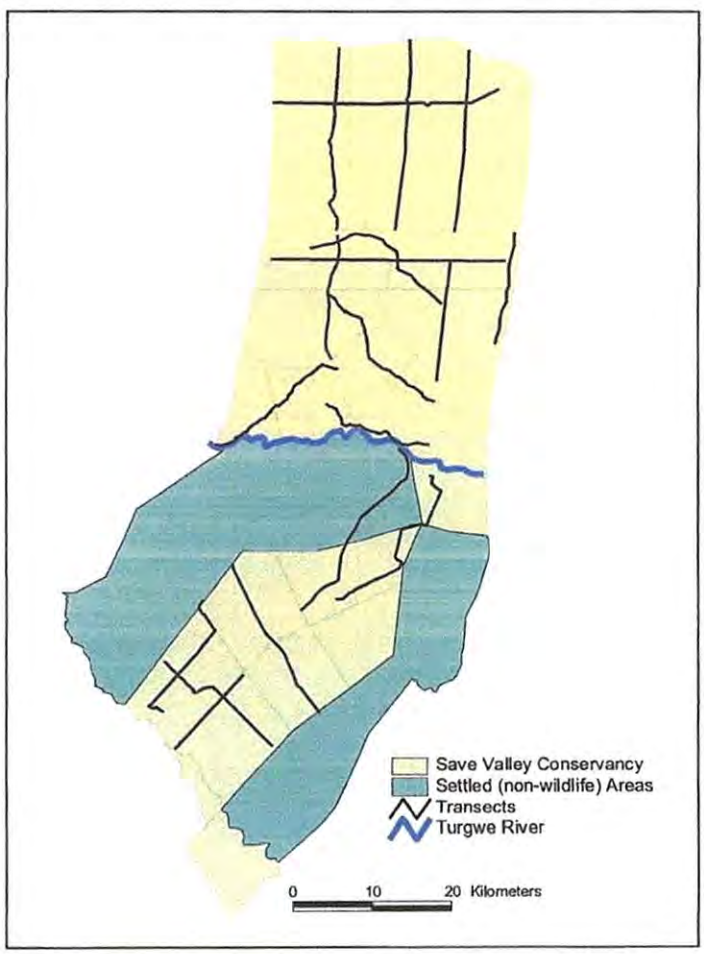
The total area of the Savé Valley Conservancy is 3,490km^2. However, the effective wildlife area (excluding the 1051km^2 of resettled land), comes to only 2,439km^2; 1,639km^2 north of the Turgwe river and 800km^2 south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.5 km, giving a penetration ratio of 6.32. In southern SVC, the combined transect length was 130.9 km, giving a penetration ratio of 6.12. For the conservancy as a whole, 390.4 km were driven (penetration ratio 6.25).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Boté, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.6 km and 29.1 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 2018



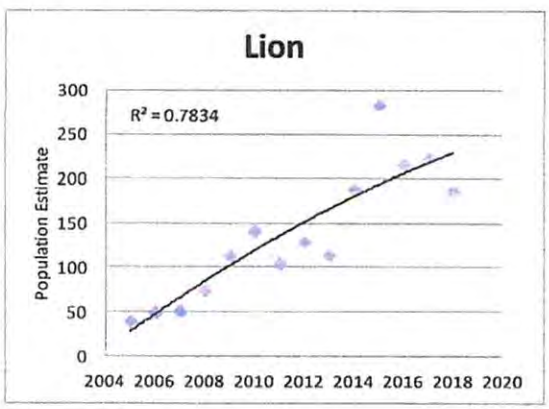
Results

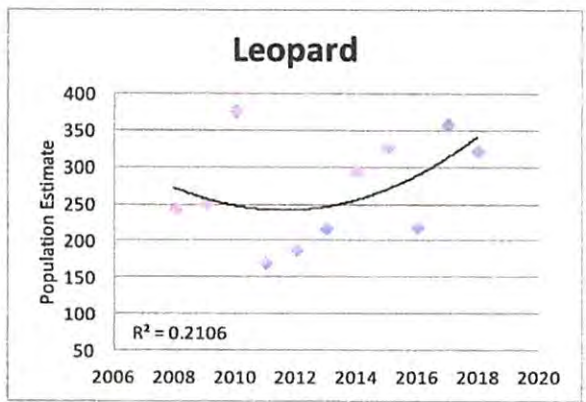
Table 1: Summary of survey parameters (2018)

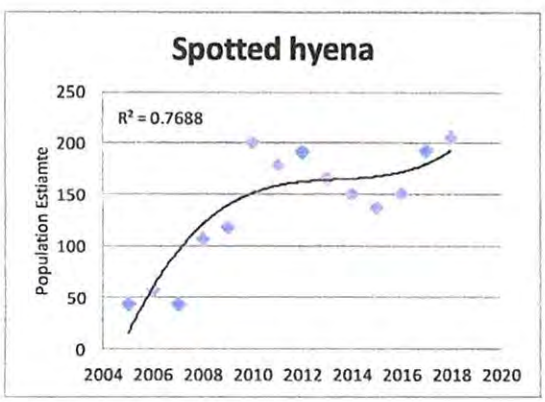
Parameter	Northern SVC	Southern SVC	Total SVC
Area (km^2)	1639	800	2439
Total number of km driven	259.5	130.9	390.4
Penetration ratio	6.32	6.12	6.25

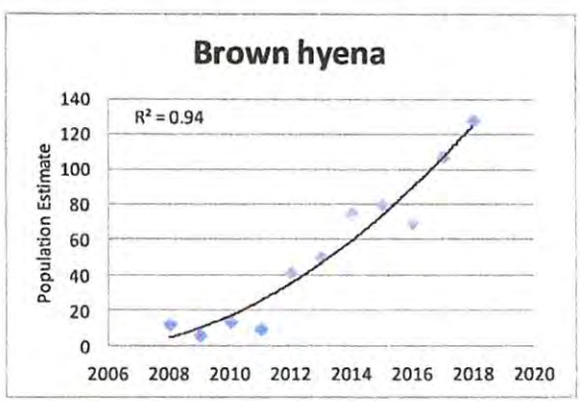
Table 2: Population estimates of the key carnivore species in the **whole of Savé Valley Conservancy** from 2008-2018 (from 2005-2018 for lion and spotted hyena).
Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; **data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts** (counts are taken from April of each year and include adult and yearling wild dogs only).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223	187
Leopard				245	252	378	172	189	218	295	328	221	359	323
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193	206
Brown hyena				12	6	14	10	41	50	75	80	70	107	128
African Wild dog				45	60	64	61	86	90	81	91	99	94	96
Black backed jackal				188	190	157	141	151	199	229	241	234	296	153









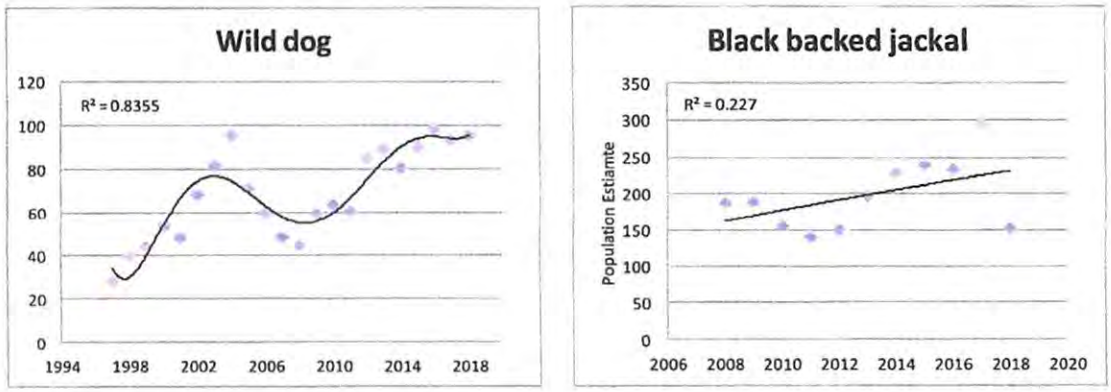


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). *A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.*

Discussion

The results show a slight drop in lion and leopard numbers, and a significant decline in black backed jackals (currently unclear as to whether this represents a genuine decline or simply a low count). The spotted and brown hyenas, and wild dog population, remain stable and/or increasing.

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to have been relatively stable since 2014, with a few natural fluctuations. Despite the slight decrease in estimated individuals since last year, the population **estimate of 187 lions** in 2018 is within range of the long-term population trend (Figure 2).

The number of lions in SVC equates to a **density of 7.7 lions / 100km²**, which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 98 lion tracks we encountered, 22% were adult males, with 65% identified as adult females, 6% as young cubs, and 7% of tracts were unidentified. 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.

In 2018 there were an estimated **323 leopard** in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2011 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a positive trend (Figure 2).

Leopards are at a **density of 13.3 leopards / 100km²** in the conservancy. This is considerably higher than densities recorded in other places, for example in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (8.1 / 100km²; Groom & Watermeyer 2018). Finally, the SVC leopard population appears to display a 2:1 ratio skewed in the favour

of females. Of the 74 leopard tracks we recorded, 62% were adult females and 30% were adult males. No cub tracts were recorded (0%) and 8% of the tracts were unidentified.

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. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. Indeed, there were an estimated **206 spotted hyenas** in 2018. The hyena population could be doing better in light of the recently stabilising lion numbers, but we will need to monitor the population to determine if a true trend is emerging.

Spotted hyenas are at a density of **8.4 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 10.4 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2018). Given the relatively lower density of the species in the conservancy, they may still increase more (especially if the lion numbers continue to drop).

There were an estimated **128 brown hyenas** in the conservancy in 2018. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **5.2 brown hyenas / 100km²** in 2018 which is higher than the average (3.4 brown hyenas / 100km²) over the last few years (2014-2017).

As reported consistently for the past few years, the **African wild dog** population appears to be levelling off. **From our comprehensive and direct monitoring of the species, there are 96 adult and yearling wild dogs in the conservancy (3.9 wild dogs / 100km²)**. Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 278 wild dogs in the conservancy, with a density of 11.4 African wild dogs / 100km². This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

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, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time. Nonetheless, their population has been relatively stable since 2011.

There has been a significant decrease in the **black backed jackal** population estimate for the conservancy. At an estimated **153 black backed jackals** in 2018, this is the lowest count of the species since 2013. Whether this is a true decline or not is unclear. At this stage, however, we are cautiously treating the 2018 count as an anomaly, but this species will need to be watched very closely. The estimated density of jackals was **6.3 jackals / 100km²** in 2018.

We once again stress, that the spoor encounter rate for **cheetah** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetah, even with large confidence intervals. Indeed, **we did not pick up a signal track for cheetah in the 2018 spoor survey**. Although we know that there are resident cheetah in the conservancy, we can safely say the population is still very low (zero cheetah tracks were seen in the 390.4 km of transects driven in 2018). However, spoor surveys are not 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 collected updated photographic information on cheetah throughout Zimbabwe, estimated c. 12 adult cheetahs in SVC in 2015 (van der Meer, 2016).** We have no reason to think this number has changed much.

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, although occasional anomalous over and undercounts need to be treated carefully. Likewise, we can trust the numbers for wild dogs, as they are from AWCF's detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give 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, using population figures directly from the graphs for these species is unadvisable.

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Acknowledgements

Permission to conduct this research was given by the Research Council of Zimbabwe, and the Savé Valley Conservancy, with the support of the Zimbabwe Parks and Wildlife Management Authority. Thank you to Chishakwe Ranch for hosting the project team and for providing logistical support. Thanks also to all of the landowners and managers in the conservancy for allowing us to conduct this spoor survey on their properties. Rueben Bote deserves special mention for his excellent track identification.

Appendix 1: All Spoor Survey Results for All Species Counted (2018)

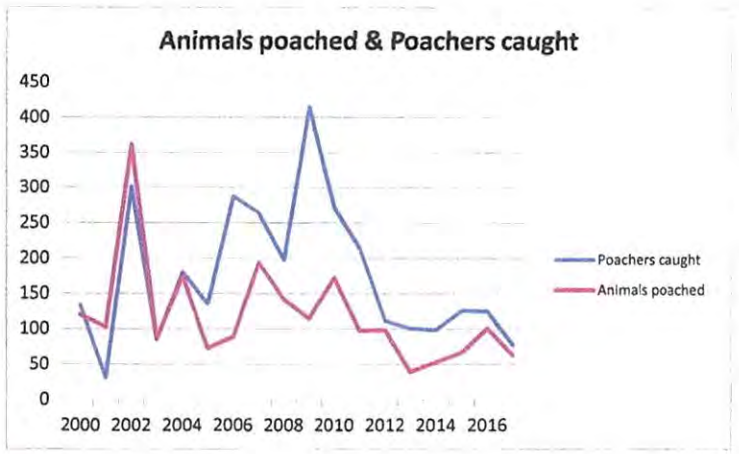
NORTH SVC Species	Survey North SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100kr
Black-backed	1639	83.9186948	Leopard	5.120115607	259.5	19	13.65789474	259.5	6.315992293	7.32177264
Brown hyaena	1639	96.2873025	Lion (Y=0.3049X)	5.874759152	259.5	50	5.19	259.5	6.315992293	19.26782274
Cheetah	1639	0	Lion (Y=0.3049X)	0	259.5	0	0	259.5	6.315992293	0
Civet	1639	777.3521202	Leopard	47.42843931	259.5	176	1.474431818	259.5	6.315992293	67.82273603
Honey badger	1639	70.66837457	Leopard	4.311676301	259.5	16	16.21875	259.5	6.315992293	6.165703276
Leopard	1639	260.5896312	Leopard	15.89930636	259.5	59	4.398305085	259.5	6.315992293	22.73603083
Lion	1639	138.6537156	Lion (Y=0.3049X)	8.459653179	259.5	72	3.604166667	259.5	6.315992293	27.74566474
Spotted hyaena	1639	125.1734933	Lion (Y=0.3049X)	7.637186898	259.5	65	3.992307692	259.5	6.315992293	25.04816956
Wild dog	1639	215.6835576	Lion (Y=0.3049X)	13.1594605	259.5	112	2.316964286	259.5	6.315992293	43.15992293
African wildcat	1639	30.91741387	Leopard	1.886358382	259.5	7	37.07142857	259.5	6.315992293	2.697495183

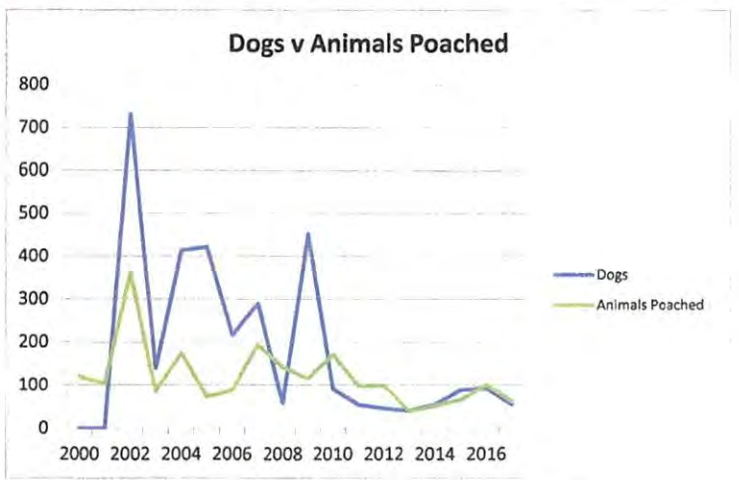
SOUTH SVC Species	Survey South SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100kr
Black-backed	800.57	68.42946995	Leopard	8.547593583	130.9	16	8.18125	130.9	6.115889992	12.22307105
Brown hyaena	800.57	31.7004926	Lion (Y=0.3049X)	3.95974026	130.9	17	7.7	130.9	6.115889992	12.98701299
Cheetah	800.57	0	Lion (Y=0.3049X)	0	130.9	0	0	130.9	6.115889992	0
Civet	800.57	222.3957773	Leopard	27.77967914	130.9	52	2.517307692	130.9	6.115889992	39.7249809
Honey badger	800.57	17.10736749	Leopard	2.136898396	130.9	4	32.725	130.9	6.115889992	3.055767762
Leopard	800.57	64.15262807	Leopard	8.013368984	130.9	15	8.726666667	130.9	6.115889992	11.45912911
Lion	800.57	48.48310633	Lion (Y=0.3049X)	6.056073338	130.9	26	5.034615385	130.9	6.115889992	19.86249045
Spotted hyaena	800.57	80.18359892	Lion (Y=0.3049X)	10.0158136	130.9	43	3.044186047	130.9	6.115889992	32.84950344
Wild dog	800.57	63.40098519	Lion (Y=0.3049X)	7.919480519	130.9	34	3.85	130.9	6.115889992	25.97402597
African wildcat	800.57	8.553683743	Leopard	1.068449198	130.9	2	65.45	130.9	6.115889992	1.527883881

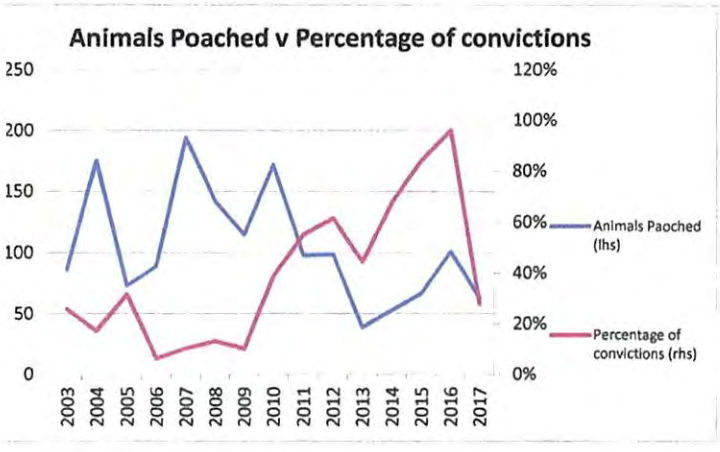
TOTAL SVC Species	Survey Total SVC (Km2)	Est. (Total area)	Equation Used Stander1998	Est. density (Animals/100km2) Y=0.3049X Y=0.6993X	Distance (km) Sum of	No. of counted	Spoor (km/spoor)	Transect (km) Sum of routes	Penetration (Area/length)	Spoor density (Spoor/100k
Black-backed	2439	152.9091816	Leopard	6.269339139	390.4	35	11.15428571	390.4	6.247438525	8.965163934
Brown hyaena	2439	127.6245484	Lion (Y=0.3049X)	5.232658811	390.4	67	5.826865672	390.4	6.247438525	17.16188525
Cheetah	2439	0	Lion (Y=0.3049X)	0	390.4	0	0	390.4	6.247438525	0
Civet	2439	996.0940973	Leopard	40.84026639	390.4	228	1.712280702	390.4	6.247438525	58.40163934
Honey badger	2439	87.3766752	Leopard	3.582479508	390.4	20	19.52	390.4	6.247438525	5.12295082
Leopard	2439	323.2936983	Leopard	13.25517418	390.4	74	5.275675676	390.4	6.247438525	18.95491803
Lion	2439	186.6747126	Lion (Y=0.3049X)	7.653739754	390.4	98	3.983673469	390.4	6.247438525	25.10245902
Spotted hyaena	2439	205.7231527	Lion (Y=0.3049X)	8.434733607	390.4	108	3.614814815	390.4	6.247438525	27.66393443
Wild dog	2439	278.1072249	Lion (Y=0.3049X)	11.40251025	390.4	146	2.673972603	390.4	6.247438525	37.39754098
African wildcat	2439	39.31950384	Leopard	1.612115779	390.4	9	43.37777778	390.4	6.247438525	2.305327869

OACHING RECORDS FROM 2000 TO DATE

YEAR	POACHERS CAUGHT	DOGS	SNARES	ANIMALS POACHED	CONVICTS	%poachers convicted
2000	134	0	2393	120	?	
2001	31	0	1009	103	?	
2002	302	731	1706	362	?	
2003	85	139	635	86	22	26%
2004	180	414	1302	175	31	17%
2005	136	422	583	73	43	32%
2006	288	217	927	89	18	6%
2007	264	290	1524	194	27	10%
2008	198	59	1017	142	26	13%
2009	415	452	1158	115	42	10%
2010	272	92	1196	172	106	39%
2011	214	55	564	98	118	55%
2012	112	47	220	99	69	62%
2013	101	41	336	39	45	45%
2014	99	56	880	53	67	68%
2015	126	89	589	67	106	84%
2016	125	93	629	101	120	96%
2017	78	56	580	63	45	28%
	3160	**3015**	**15450**	**1920**	**885**	






Animals Poached v Percentage of convictions
250
200
150
100
50
0
120%
100%
80%
60%
40%
20%
0%
2003
2004
2005
2006
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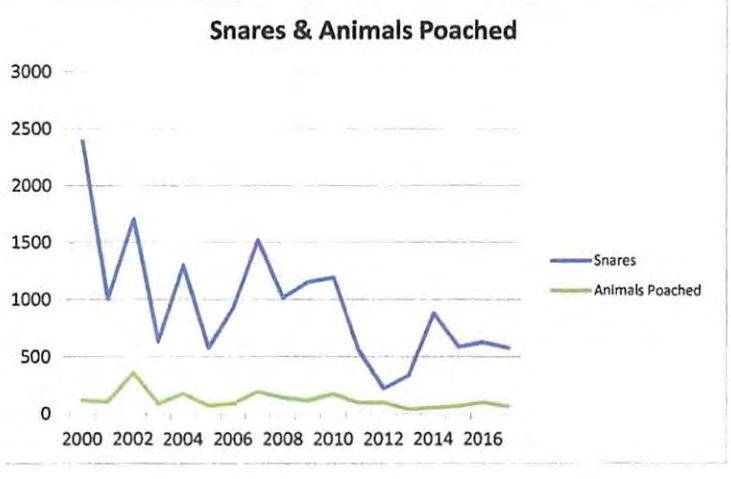
Animals Paoched (lhs)
Percentage of convictions (rhs)


Snares & Animals Poached
3000
2500
2000
1500
1000
500
0
2000 2002 2004 2006 2008 2010 2012 2014 2016
Snares
Animals Poached

CHRIS SCHNEZLER
(b) (6)
POWELL, OH (b) (6)

25-0216/0440

(b) (6)

DATE 1/16/19

PAY TO THE ORDER OF U.S. Fish & Wildlife Services $ 100—

One hundred exact ——— DOLLARS

Security Features Included. Details on Back.

FIFTH THIRD BANK

MEMO (b) (6)

JAN 2 8 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

FEB 0 4 2019 LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HENDERSON	DONALD	E.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #, no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MARCO ISLAND	FLORIDA	(b) (6)		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 the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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)

Donald E Henderson 2/1/2019

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 a trophy 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 4-6 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.

N/A

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

DON HENDERSON (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
PANTERO LEO (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:
NAMWALA GAME MANAGEMENT AREA
NAMWALA, ZAMBIA
(NEAREST VILLAGE IS ITEZHI TEZHI)

b. Date wildlife is to be hunted:
1 AUGUST 2019 THROUGH 21 AUGUST 2019

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
GM ZAMBIA SAFARIS
GREG MICHELSON PROFESSIONAL HUNTER

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 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 foreign 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). NOT HUNTED YET DO NOT CURRENTLY HOLD ANY SUCH PERMITS

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:
Business Name: BANGWEULU TAXIDERMY
Address: 4142 IK CHIFWEMA ROAD, NEW KASAMA
City: LUSAKA
State/Province: LUSAKA
Country, Postal Code: ZAMBIA 10101

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?
THE 3 YEAR TREND FOR LION IS UP BASED ON MONTHLY OBSERVATIONS AND TRAIL CAMERA SURVEYS.

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, local community, or government?
$ 15000 USED FOR 10 ANTI POACHING RANGERS, 21 COMMUNITY SCOUTS, COMMUNITY RESOURCE BOARD AND ZAMBIA GOVERNMENT FEES.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?
BUILT 3 SCHOOLS FOR 270 CHILDREN
GAME MEAT FOR NEARBY COMMUNITIES
CONTRIBUTE FUEL AND RATIONS FOR DEPARTMENT OF NATIONAL PARKS AND WILDLIFE.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: Donald E Henderson Date: 2/1/2019

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 governments 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 shipments 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).

(b) (6) -05

63-215/631

(b) (6)

Date 2/1/19

Pay to the order of US Fish & Wildlife Service $ 100 00

One Hundred and no/100 Dollars

SUNTRUST ACH RT 061000104

Memo (b) (6)

Don E Henderson

FEB 0 4 2019

RCVD JUN 28 201

June 20, 2016

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: DONALD M. HUBER
(b) (6) [redacted]
LION PERMIT

To Whom it May Concern:

I purchased a $60,000 Lion Hunt for Zambia in February of 2015 for a September 2016 hunt.

I understand U.S. Fish and Wildlife now requires a Cities Permit for Lions. Enclosed is a completed Cities Permit Application and my check in the amount of $100. Please let me know if there is anything further I need to do as I am scheduled to fly out September 10, 2016 for my hunt September 12, 2016.

Thank you,

Don Huber

Don Huber
(b) (6) [redacted]
White Sulphur Springs, WV (b) (6) [redacted]
(b) (6) [redacted]

enclosures

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

Federal Fish and Wildlife Permit Application Form

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

RCVD JUN 28 2016

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Huber	Donald	M	

(b) (6) [redacted]

5. Affiliation/ Doing business as (see instructions): NA

6.a. Telephone number

(b) (6) [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	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

(b) (6) [redacted] ile #, or Room #; no P.O. Boxes)

1.b. City	1.c. State		1.f. Country
White Sulphur Springs	WV	(b) (6) [redacted]	USA

(b) (6) [redacted] ifferent than physical address; include name of contact person if applicable)

2.b. City	2.c. State		2.f. Country
White Sulphur Springs	WV	(b) (6) [redacted]	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 43490B 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.

Donald M. Huber — Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures)

6/20/16 — 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.
   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: Lower Lupande hunting Block, in The Luanga Valley
   Nearest City Chipata Area - MFuwe. Eastern Zambia. GPS - S13.14775 E031 38 880
   b. Date wildlife is to be hunted: September-12, 30 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). Skull, Life Size 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: Mary-Anne Fernandes
Business Name: Highveld Taxidermists
Address: P.O. Box 34242
Address: Farm 354, Vlakplatts, Hennopsriver 0023, South AFRICA
City: Erasmia
State/Province:
Country, Postal Code: South AFRICA 0023

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: Donald M. Hale Date: 6/20/16

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):

DONALD M. HUBER (b) (6) [redacted]

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.

RCVD JUN 28 2016

Bank of America Advantage

(b) (6) [redacted]

(b) (6) [redacted]

6/20/16
Date

Pay to the order of US Fish + Wildlife Service $ 100.00

One hundred + Dollars

Bank of America

ACH R/T 063100277

Memo Lion 2016 Unit

Don Hubner

(b) (6) [redacted]

LION ZAMBIA ESA TROPHY

Permit Number: MA00478C-0
Effective: 10/20/2017 Expires: 10/19/2018

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:

DONALD M. HUBER
(b) (6)
[redacted]

WHITE SULPHUR SPRINGS, WV (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2016 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).

US Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
Attn: Caroline Harlow
5275 Leesburg Pike
Falls Church, VA 22051-3803
703-358-2104

FEB 0 6 2019

RE: Permit MA00478C-0 Renewal

Ms. Harlow,

Please find enclosed Form 3-200-52 for rewnewal of CITES Permit MA00478C-0, as well as a check for the $100 processing fee. I have also enclosed copies of the original permit (the original permit itself has gone missing in 18 months since issuance due to moving homes), as well as a copy of the CITES Export Permit from South Africa.

Please contact (b) (6) Allan Bradley, at (b) (6) if you have any concerns as he is assisting us in this process.

Thanks,

Don Huber

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

FEB 0 5 2019

FEB 0 6 2019

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

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

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. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HUBER	DONALD	M	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
White Sulphur Springs	WV	(b) (6)		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
Windermere	FL	(b) (6)		USA

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. 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.

Donald M Huber 2/4/19

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

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 regular mail through the U.S. Postal Service.

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

   Allan Bradley, (b) (6) [redacted]

3. 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?

   ☒ 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.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA00478C-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: Donald M. Hu Date: 2/4/19

   X b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: Donald M. Hu Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

(b) (6)

DONALD M. HUBER
(b) (6)
WINDERMERE, FL (b) (6)

PNC BANK
63-8419/2670

EZShield™ Check Fraud Protection for Business

2/4/2019

PAY TO THE ORDER OF US Fish & Wildlife Service

$ **100.00

One Hundred and 00/100********** DOLLARS

Security features. Details on back.

US Fish & Wildlife Service
Div of MGMT Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA. 22051-3803

MEMO Permit MA00478C-0 Renewal

AUTHORIZED SIGNATURE

(b) (6)

FEB 0 6 2019

LION ZAMBIA ESA TROPHY

Permit Number: MA00478C-0
Effective: 10/20/2017 Expires: 10/19/2018

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:

DONALD M. HUBER
(b) (6)
WHITE SULPHUR SPRINGS, WV (b) (6)
U.S.A.

Authority: Statutes and Regulations: 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 Zambia 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 2016 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zambia for the 2016 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).

PERMIT / CERTIFICATE № 213241

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

[ ] EXPORT
[X] RE-EXPORT
[ ] IMPORT
[ ] OTHER

ORIGINAL

2. Valid until 10/06/2019

3. Importer (name and address) Donald M. Huber
(b) (6)
White Sulphur Springs
WV (b) (6) U.S.A.

4. Exporter / Re-exporter (name, address and country)
Highveld Taxidermists
354 Vlakplaats
Hennopsriver
Erasmia, 0023

3a. Country of import U.S.A.

5. Special conditions Invalid without attached permit conditions (pag 2 of 2) Integrated document attached A-B ZA 202873 dd 29/06/2017 C-ZA 203914 dd 20/07/2017 replaces 206521 dd 22/09/2018

Captive animals, this permit or certificate is only valid if the transport conditions conform with the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations. Permit / certificate valid for one consignment only.

6. Name, address, national seal / stamp and country of Management Authority

Department of Environmental Affairs
Private Bag X447
PRETORIA
0001
SOUTH AFRICA

5a. Purpose of the transaction (see reverse) H

5b. Security stamp No. 1665480

	7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex) if live	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported / quota
A	7.8 Lion (Panthera leo)	9. Full mount	10. II W	11. 1 (one)	11a.
	12. Country of origin* ZM | Permit No. 39354 | Date 18/05/17 | 12a. Country of last re-export | Certificate No. | Date | 12b. No. of the operation ** or date of acquisition ***				
B	7.8 Lion (Panthera leo)	9. Skull bleached	10. II W	11. 1 (one)	11a.
	12. Country of origin* ZM | Permit No. 39354 | Date 18/05/17 | 12a. Country of last re-export | Certificate No. | Date | 12b. No. of the operation ** or date of acquisition ***				
C	7.8 Hippo (Hippopotamus amphibius)	9. Tusks on Shield	10. II W	11. 12 (twelve)	11a.
	12. Country of origin* ZM | Permit No. 39354 | Date 18/05/17 | 12a. Country of last re-export | Certificate No. | Date | 12b. No. of the operation ** or date of acquisition ***				
D	7.8	9.	10.	11.	11a.
	12. Country of origin* | Permit No. | Date | 12a. Country of last re-export | Certificate No | Date | 12b. No. of the operation ** or date of acquisition ***				

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
*** For Pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:

LA Cotter

Pretoria
Place

11/12/2018
Date

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG, 2000

1665480

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	

15. Bill of Lading/Air Waybill Number:

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30):***
   Office: +27 (11) 390-3687/ 2311
   Fax: +27 (11) 390-1720

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement,*** for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

Signature of Issuing Officer	Date	Signature of Recipient	Date
LA Lötter		Lisa Ferreira	2019-01-05
Full Name		Full Name	

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade In Endangered Species Regulations, 2010.

INTEGRATED PERMIT No.: 213241

This is an integrated permit for species listed in the CITES- and Threatened or Protected Species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

Signature

Date:

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
11 DEC 2018
DIRECTORATE OF CONSERVATION PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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February 6, 2019

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

RCVD FEB 8 2019

RE: Import Application of Zimbabwe Lion Trophy for Mark Baker

Dear Chief Cogliano:

Enclosed please find the permit application to import of a lion trophy from Zimbabwe for Mark Baker. Also attached to the permit application is the 2018 Operator Enhancement repot from Mazunga Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Mark Baker's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

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: C Mark Baker

Name: C. Mark Baker

Date: 2/5/19

RCVD FEB 8 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Type of Activity: Lion - Zimbabwe

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

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Baker	Charles	Mark	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Houston	Texas	(b) (6)		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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. 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)

Charles Mark Baker 1/31/19

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 a trophy 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 4-6 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 in Section A and Section C on page 1.

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

   Charles Mark Baker
   Cell Phone (b) (6) [redacted]

3. 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?

☒ 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.

Not applicable.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthero Leo, 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, Bubye Valley Conservancy, Matabeleland South.
Nearest city: Beit Bridge. See attached Map.

   b. Date wildlife is to be hunted:

October 7-26, 2019

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

Mazunga Safaris with PH John Sharp

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

   b. Date wildlife was hunted:

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

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 foreign export/re-export document]:

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). I have not hunted yet and do not currently hold any such permits or licenses.

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:
Business Name: Stephen Collett
Address: Collett's Wildlife Artistry
City: 15 Josiah Chinamano Avenue
State/Province: Bulawayo
Country, Postal Code: Matabeleland, Zimbabwe NIL

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

No. See attached Operator Enhancement Report and information furnished by Zimb Parks and CONSERVATION FORCE

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, local community, or government?

D/Rs=$54000 & TR.Fee=$47000. Approx. 30% of all earnings funds Anti-Poaching operations (mainly protection of Rhino, which are State-owned and BVC are just custodians). Schools within 10 kms of boundary are part of annual community development program. 3600kgs meat donated every month.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

BVC has conducted 7 years of in-depth research on both Lions and Leopards, along with annual population surveys of other predators and all herbivores. BVC = Bubye Valley CONSERVANCY

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 an elephant trophy, I understand that my client may import no more than two elephant 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:

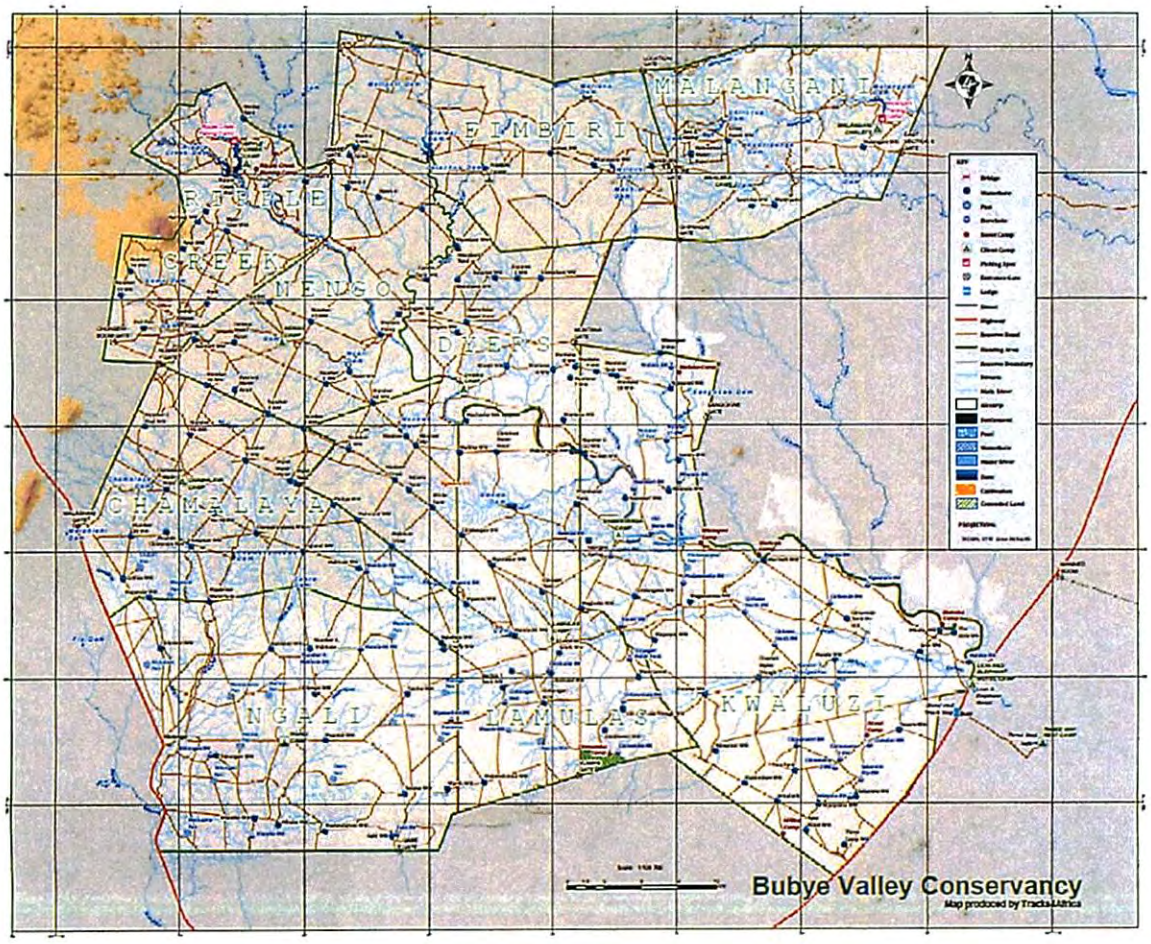
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: Charles Mark Bohrer Date: 1/31/19

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 governments 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 shipments 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).

5.a.


MALANGANI
EIMBIRI
GREEK
MENGO
DZERS
CHAMELAVA
NGALI
LAMULAS
KWALUZI
Bubye Valley Conservancy

ZAMBIA
RIFA SAFARI AREA
MANA POOLS
0 100 Kilometres
Kariba
LAKE KARIBA
CHARARA SAFARI AREA
MUZARABANI
MATUSADONA
Karoi
CHAMINUKA
UMFURUDZI
CAPRIVI STRIP
Chinoyi
GOKWE NORTH
Harare
ZAMBEZI
Victoria Falls
HARTLEY
Marondera
CHIRISA
MATETSI
BINGA
Hwange
GOKWE SOUTH
Kadoma
RHODES NYANGA
KAZUMA PAN
MATETSI
DEKA
Kwekwe
Mutare
HWANGE
Gweru
CHIMANIMANI
TSHOLOTSHO
BOTSWANA
Bulawayo
Masvingo
CHIPINGE
BULUMA MANGWE
Plumtree
RHODES MATOPOS
CHIREDZI
LOWVELD
GONAREZHOU
BEITBRIDGE
Beitbridge
SOUTH AFRICA
MOZAMBIQUE
ZIMBABWE
HUNTING AREAS
National Park (Non-Hunting)
Safari Area (Hunting)
Campfire Area (Hunting)
John Sharp Hunting Area

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: **MAZUNGA SAFARIS**

   a. Years in business: **22 YEARS**

   b. Name of company conducting hunt: **MAZUNGA SAFARIS**

   2. Name of concession: **BUBYE VALLEY CONSERVANCY** Size in km^2: 3400

   a. Land tenure: __ Government lease __ Community __ Private ranch **XX Private Conservancy**

   b. Length of concession agreement: **OWNER** Can it be renewed? __ Yes __ No – **N/A**

   c. Length of renewal, if applicable: **N/A**

   d. Estimated total amount received in trophy fees last year, if applicable: $ **1,890,000-00**

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: **SHAREHOLDERS EXPECT ANNUAL REPORTING AND MAZUNGA PARTICIPATES IN ALL OF THE ABOVE WITH EARNINGS FROM HUNTING OPERATIONS FUND :-**

   - **THE RHINO PROTECTION OPERATIONS**
   - **COMMUNITY DEVELOPEMENT AND SUPPORT**
   - **THE MAJORITY OF THE 400 EMPLOYEES ARE FROM SURROUNDING COMMUNITIES.**

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **BEIT BRIDGE DISTRICT OF MATABELELAND SOUTH – BEIT BRIDGE - MAP ATTACHED.**

   g. If the concession borders a national park, please provide the park name: **N/A**

   h. Description of general and distinctive habitat features and any water features: **LOW LYING ARID MOPANE WOODLAND WITH THE BUBYE RIVER RUNNING THROUGH THE MIDLLE OF THE PROPERTY – SEASONAL RIVER, NOT PERENNIAL. A NUMBER OF DAMS CONSTRUCTED FOR GAME WATER SUPPLIES AND ALL WATER POINTS (APPROX. 350) ARE PUMPED FROM THE DAMS OR BOREHOLES....I.E. ARTIFICIAL WATER POINTS.**

3. Are there any communities living in the concession? __ Yes **XX** No

   a. If so, estimated number of people or villages in the concession? **N/A**

4. Are there communities bordering this concession? XX Yes __ No

   a. If so, estimated number of people or villages around the concession? **OVER 2000**

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance	Est. population	3-Year trend (up/	How monitored?

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

	(dense/avg./sparse)		down/ stable)	
Elephant	**AVERAGE**	**+/- 800**	**INCREASING**	**ANNUAL ESTIMATES**
Lion	**DENSE**	**500 +**	**STABLE / MANAGED**	**ANNUAL BAITED CALL-UP SURVEY**
Leopard	**AVERAGE**	**260 - 300**	**STABLE**	**ANNUAL C/TRAP SURVEY**
Prey species	**DENSE**		**DOWN BECAUSE OF LION PREDATION**	**ANNUAL ROAD STRIP COUNTS**

6. Total employment number: **400 +...various slightly during the year**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	**12**	**nil**
Trackers	**30+**	**+/- 20 %**
Anti-poaching scouts/rangers	**130**	**+/- 70%**
Other anti-poaching	**FENCE GUARDS 48**	**+/-80%**
Cooks/housekeepers	**43**	**+/- 60%**
Community coordinators	**4**	**100%**
Managers	**13**	**2**
Biologists	**2**	**NIL**
Others: _____	**1 NGO RESEARCHER – RHINO MONITORING**	

7. Number of staff employed in the off-season: **400 +**

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	**130**	**+/- 70%**	**FULL TIME**
Managers	**13**	**2**	**FULL TIME**
Maintenance	**30+**	**+/- 80%**	**FULL TIME**
Road opening/construction	**50+**	**+/- 80%**	**FULL TIME**
Community relations personnel	**4**	**4**	**VARIES**
Others: _____	**+/- 190**	**+/- 80%**	**FULL TIME**

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **130 SCOUTS & 48 FENCE GUARDS**

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH – 365 DAYS PER YEAR.**

c. Months during which anti-poaching patrols are conducted: **JAN. – DEC.**

d. Number of anti-poaching patrols per month: **AVE. 50 - 55 AT ANY TIME**

e. Description of anti-poaching equipment, vehicles, etc.: **4 MOBILE VEHICLE REACTION UNITS AND THE REST FOOT PATROLS THAT ARE BASED IN SPECIFIC PATROL AREAS.**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **4 MANAGERS ARE EMPLOYED AS FULL TIME ANTI-POACHING COORDINATORS.**

g. Do you offer rewards to poaching informants leading to arrest? **XX Yes** __ No

h. Do you offer rewards to poaching informants upon conviction? **XX Yes** __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **U.S.$**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS	**600 000**	**780 000**	**1.200 000**	**INCREASED THREAT TO RHINO HAS NECCESSITATED AN INCREASE IN A/P EXPENDITURE OVER THE PAST 5 YEARS.**

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	**60 - 100**	**60 - 100**	**60 - 100**	
Elephant carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Lion carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Leopard carcasses observed	**0**	**0**	**0**	**NO POACHING RECORDED**
Ivory poachers arrested	**0**	**0**	**0**	
Meat poachers arrested	**AVE. =/- 20**	**AVE. =/- 20**	**AVE. =/- 20**	
Other poachers arrested	**1**	**1**	**4**	**Armed Rhino poachers**
Poachers convicted	**0**	**1 + 1**	**0**	**A NUMBER DEFAULTED**

		killed		**AFTER BEING REMANDED OUT OF CUSTODY.**
Snares/gin traps collected				**+/- 200 SNARES PER YEAR.**
Firearms confiscated	**1**	**0**	**1**	
Vehicles confiscated	**0**	**0**	**0**	
Bicycles confiscated	**0**	**0**	**0**	
Boats/nets confiscated	**+/- 10-NETS**	**+/- 10-NETS**	**+/- 10-NETS**	**NO BOATS**
Tusks recovered	**0**	**0**	**0**	
Other: **RHINO HORNS**	**3**	**11**	**4**	**Note: 2018 results are far better – arrests & kills , rifles recovered & convictions.**

10. Community investment:[3]

    a. Does the company contribute money or goods/services to local communities? **XX Yes** __ No

    b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **AVE OF BETWEEN US$ 150000 TO 250 000 PER YEAR – VOLUNTARY**

    c. Does the company provide game meat to nearby communities? **XX Yes** __ No

    d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: **3600 KGS PER MONTHS (US$ 10 800/MONTH) OR 43 – 44 TONS (US$ 132 000) PER YEAR EQUALLY ALLOCATED TO THE 3 DISTRICTS THAT THE CONSERVANCY FALLS WITHIN.... Beit Bridge, Mwenezi & Gwanda**

    e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. PAC KILLINGS ON REQUEST FROM NATIONAL PARKS & WILD LIFE AUTHORITY.

    f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **NIL – CONSERVANCY HAS AN ELECTRIC GAME FENCE TO PREVENT HUMAN / WILDLIFE CONFLICT.**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	N/A	N/A	N/A	N/A
Lion	N/A	N/A	N/A	N/A
Leopard	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **U.S.$**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	**71000**	**134000**	**110000**	**REDUCED HUNTING INCOME AND MORE FUNDS REQUIRED FOR RHINO PROTECTION OPERATIONS.**
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)	**178000**			**MTETENGWE CLINIC – 3 YEAR PROJECT**
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	**2300**			**SPORTS UNIFORM – PENMEMENE SCHOOL ..FOR PROVINCIAL FINALS.**
Construction materials donated	**+/- 10 000**	**+/- 10 000**	**+/- 10 000**	
Other: _____				
Other: _____				
TOTALS	**251300**			

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	**2015: 4** **2016: 6** **2017: 3**	**2015: 9** **2016: 10** **2017: 10**	**2015: 13** **2016: 12** **2017: 5**	**2015: 103** **2016: 107** **2017: 96**
Percentage of U.S. clients	**2015: 100 %** **2016: 66 %** **2017: 60 %**	**2015: 75 %** **2016: 91 %** **2017: 46 %**	**2015: 87 %** **2016: 86 %** **2017: 83 %**	**2015: 90 %** **2016: 92 %** **2017: 81 %**
Trophy fees paid by U.S. clients	**2015: 15000** **2016: 33660**	**2015: 315000** **2016: 425040**	**2015: 78300** **2016: 103200**	**2015: 1602148** **2016: 1478123**

clients	**2016:6** **2017: 3**	**2016: 10** **2017: 10**	**2016: 12** **2017: 5**	**2016: 107** **2017: 96**
Percentage of U.S. clients	**2015: 100 %** **2016: 66 %** **2017: 60 %**	**2015: 75 %** **2016: 91 %** **2017: 46 %**	**2015: 87 %** **2016: 86 %** **2017: 83 %**	**2015: 90 %** **2016: 92 %** **2017: 81 %**
Trophy fees paid by U.S. clients	**2015: 15000** **2016: 33660** **2017: 21000**	**2015:315000** **2016: 425040** **2017: 197800**	**2015:78300** **2016: 103200** **2017: 74700**	**2015:1602148** **2016: 1478123** **2017: 1403835**

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:- --- **OVER THE LAST 3 YEARS (2015,2016 & 2017) = AVE. US$ 4,114,248 X 87 % U.S. CLIENTS.**

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

BVC IS RENOWNED FOR ITS STRICT HUNTING POLICIES AND ENFORCES ETHICAL HUNTING PRACTICES BY ALL PHS. BVC USES A CORE OF REGULAR PHS WHOARE SELLECTED ON REPUTATION AND ETHICAL BEHAVIOUR.

BVC WAS THE FIRST OPERATION TO INTRODUCE AGE MINIMUMS FOR BUFFALO, LION AND LEOPARD AND WAS INSTRUMENTAL IN PUSHING FOR ZIM. PARKS TO ADOPT AN AGE POINTS SYSTEM TO CONTROL LION AND LEOPARD QUOTAS.

AS PART OF OUR POLICY BVC DOES NOT ALLOW ANY SHOOTING FROM A VEHICLE (OTHER THAN SMALL CATS AT NIGHT) – NO HUNTING WITHIN 1 KM OF ANY CAMP - NO HUNTING OR BAITING FOR CATS WITHIN 500 M OF A WATER POINT – NO HUNTING OUT OF LARGE HERDS – NO HUNTING OF BUFFALO OUT OF HERDS (RESTRICTED TO SMALL GROUPS OF DAGA BOYS) – NO SOFT TOP BUFFALO – NO LION PRIDE MALES.....NUMEROUS OTHER RULES WHICH A PH HAS TO ABIDE BY IF HE IS TO REMAIN ONE OF OUR REGULAR / CORE PHS.

ALL OF THE ABOVE IS WELL KNOWN TO ALL ZIM. PHS AND ALL CLIENTS THAT HAVE HUNTED ON BVC.

WE HAVE 7 YEARS OF DATA FROM RESEARCH CONDUCTED ON BVC FOR LION, LEOPARD AND HERBIVORES AND THIS DATA IS OFTEN USED AT WILDLIFE WORKSHOPS AND QUOTA SETTING MEETINGS.

WITHOUT DOUBT, THERE IS NOT ANOTHER ZIMBABWEAN HUNTING OPERATION THAT DOES AS MUCH FOR THE COMMUNITIES AS BVC AND AGAIN THIS IS COMMON KNOWLEDGE AND CAN EASILY BE VARIFIED.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: R.H. Leathem Title: General Manager

Ripple Creek
Fimbiri
Malangani
Towla
Nengo
Dyers
Chamalaya
Samanyanga
Lamulas
Mazunga
Ngali
Kwaluzi

RCVD FEB 8 2019

(b) (6) [redacted]

32-61/1110

(b) (6) [redacted]

DATE 2/5/19 PMP

PAY TO THE ORDER OF United States Fish + Wildlife Servic $ 100.00

One hundred and no/100 DOLLARS

← Heat Reactive Ink

J.P.Morgan
Founded 1799
JPMorgan Chase Bank, N.A.
Dallas, Texas

MEMO lien permit

C Mark Bailey MP

(b) (6) [redacted]

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

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February 6, 2019

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

RCVD FEB 8 2019

RE: Import Application of Mozambique Lion Trophy for Ryan Herring

Dear Chief Cogliano:

Enclosed please find the permit application to import a lion trophy from Mozambique for Ryan Herring. Also attached to the permit application is the 2018 Operator Enhancement repot from Safrique - Mozambique Hunting Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Mozambique authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Ryan Herring's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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 the attorney, 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: Ryan Herring

Date: 1/21/19

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD FEB 8 2019

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: Lion - Mozambique
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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Herring	Ryan	Anthony	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Lawton	OK	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Lawton	OK	(b) (6)		USA

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. 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): 1/19/19

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:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) 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

(4) 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 regular mail through the U.S. Postal Service.

   Same as above: Ryan Herring (b) (6) Lawton, OK (b) (6)

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

   Ryan Herring (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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   (Panthera, P. Leo) 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:

   Block L1 Niassa Reserve, Niassa Province, Mozambique

   b. Date wildlife is to be hunted: October 2020

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

   Safrique, Lda and Professional Hunter is Paul Davies

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:

   b. Date wildlife was hunted:

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

   c. 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]:

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).

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:
Business Name:
Address: 53 Maple St Pomona, Kempton Park, 1619, South Africa
City:
State/Province:
Country, Postal Code:

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? See attached operator report.

   Please see the attached Operator Enhancement Report.

   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?

   Please see the attached Operator Enhancement Report.

   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?

   Please see the attached Operator Enhancement Report.

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 1/21/19

    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.

All international shipment(s) must be imported 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).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: _Block L1 Safrique_____

   a. Years in business: _11 years_____

   b. Name of company conducting hunt: __Safrique Safaris_____

   2. Name of concession: __Block L1___ Size in km^2: __4,000 _____

   a. Land tenure: __ Government lease X Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 15 years_____ Can it be renewed? X Yes __ No

   c. Length of renewal, if applicable: Further 15 years_

   d. Estimated total amount received in trophy fees last year, if applicable: $_____

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: _____All the above_____

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Mavago District, Lichinga City__

   g. If the concession borders a national park, please provide the park name: Niassa

   h. Description of general and distinctive habitat features and any water features: Miombo Woodland / Lussa_____

3. Are there any communities living in the concession? X Yes __ No

   a. If so, estimated number of people or villages in the concession? 18,000_____

4. Are there communities bordering this concession? x Yes __ No

   a. If so, estimated number of people or villages around the concession? 5,000_____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				
Lion	2 small prides	Many single males	stable	Sight
Leopard	Many, many.	Very difficult to count	stable	sight
Prey species	Sable, hartebeest, buffalo, zebra, eland, warthog, bushpig, and many plains game	Large numbers	stable	sight

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

6. Total employment number: 25_____

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	1	0
Trackers	2	2
Anti-poaching scouts/rangers	14	14
Other anti-poaching	2	2
Cooks/housekeepers	3	3
Community coordinators	1	1
Managers		
Biologists		
Others: _____	2	2

7. Number of staff employed in the off-season: __15_____

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	14	14	
Managers	1	1	
Maintenance			
Road opening/construction			
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: __14_____

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? _Both

   c. Months during which anti-poaching patrols are conducted: _January thru December___

   d. Number of anti-poaching patrols per month: Off Season 2 per month / In season – all _____

   e. Description of anti-poaching equipment, vehicles, etc.: Landcruisers, radio, shotgun, uniforms__

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? _Manager / HR Manager

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

g. Do you offer rewards to poaching informants leading to arrest? X Yes __ No

h. Do you offer rewards to poaching informants upon conviction? X Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? Metical_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	840,000			
Equipment	200,000			
Vehicles	600,000			
Petrol	300,000			
Rewards paid	20,000			
Other: _____				
Other: _____				
TOTALS	2,040,000			

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	30			
Elephant carcasses observed	7			
Lion carcasses observed	0			
Leopard carcasses observed	0			
Ivory poachers arrested	0			
Meat poachers arrested	15			
Other poachers arrested	0			
Poachers convicted	2			
Snares/gin traps collected	900			
Firearms confiscated	0			
Vehicles confiscated	0			
Bicycles confiscated	25			
Boats/nets confiscated	5			
Tusks recovered	0			
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? 20% of Concession fees_____

c. Does the company provide game meat to nearby communities? X Yes __ No

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 3 plus Buffalo, community centers._____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. We do not_____

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? do not_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Metical___

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements	Bore Hole for water.			450,000 Meticals
Sports teams funded				
Construction materials donated				
Other: _____	Tractor and vehicles			50,000 meticals
Other: _____				
TOTALS				500,000 meticals

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay? 5, 80%, $150,000 US dollars

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015:0 2016:0 2017:0	2015:1 2016:1 2017:0	2015:3 2016:2 2017:1	2015:many 2016:many 2017:many
Percentage of U.S. clients	2015: 2016: 2017:	2015:100 2016:0 2017:0	2015:0 2016:100 2017:0	2015: 2016: 2017:
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _$150,000_____

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

    No females of any species are hunted or harvested

    Only lions of 6 years or older are hunted or harvested

    No pride males are hunted or harvested.

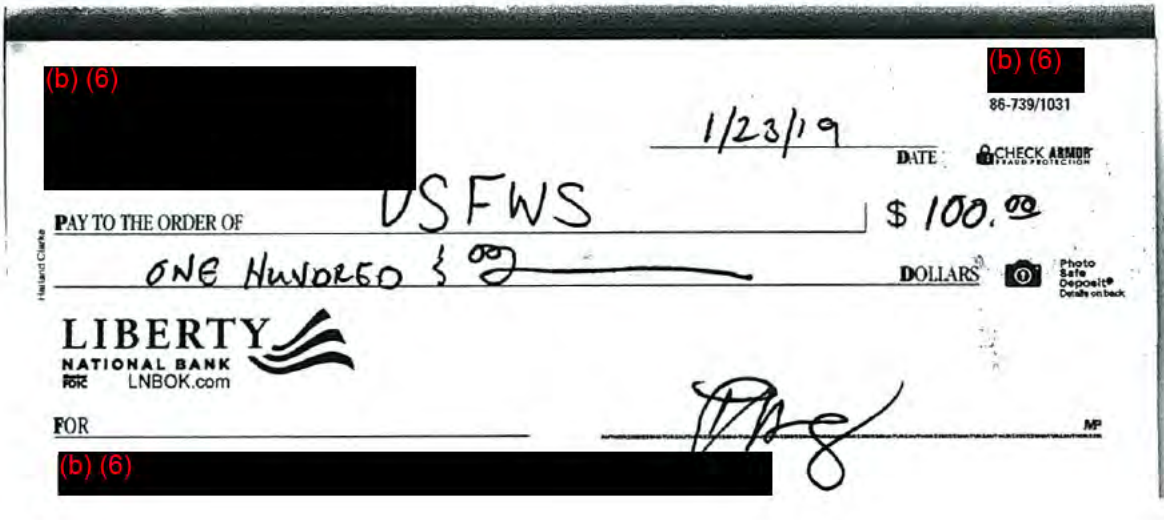
    Dams built for watering of wildlife

14. I declare that the foregoing is true and correct.

    Signature: _____

    Name: RYAN HERRING Title: PRESIDENT

RCVD FEB 8 2019



(b) (6) [redacted]

(b) (6) [redacted]

86-739/1031

1/23/19

DATE

CHECK ARMOR FRAUD PROTECTION

PAY TO THE ORDER OF USFWS

$ 100.00

ONE HUNDRED $ 00

DOLLARS

Photo Safe Deposit® Details on back

Harland Clarke

LIBERTY NATIONAL BANK

FOR LNBOK.com

FOR

(b) (6) [redacted]

MP

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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February 6, 2019

RCVD FEB 8 2019

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

RE: Import Application of Zambia Lion Trophy for Frankie Limmer

Dear Chief Cogliano:

Enclosed please find the permit application to import of a lion trophy from Zambia for Frankie Limmer. Also attached to the permit application is the 2018 Operator Enhancement repot from Sitatunga Ranching and Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Frankie Limmer's Lion Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@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 of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

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: Frankie Limmer

Name: Frankie Limmer

Date: 1/20/19

RCVD FEB 6 2019

Form 3-200-20

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

OMB Control No. 1018-0093
Expires Rev 08/31/2020

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: Lion - Zambia
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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
LIMMER	FRANKIE	GENE	MD.

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
TAYLOR	TX	(b) (6)		U.S.A.

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. 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.

Frankie Limmer — 1/20/19

Signature of applicant/Principal Officer 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: 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:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.
   JOHN JACKSON, CONSERVATION FORCE, 504-837-1233
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
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 X 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.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   PANTHERA LEO

   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:

   b. Date wildlife is to be hunted:

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

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:
   ZAMBIA, LUAWATA GMA, CHIPATA

   b. Date wildlife was hunted: JULY 06, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
   SITATUNGA RANCHING AND SAFARIS

   c. 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]:
   PLOT 7301 KAMBALA ROAD
   LIGHT INDUSTRIAL AREA LUSAKA ZAMBIA

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).

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: VAL HEATH
Business Name: TROPHY TRACKERS CONSULT
Address: 12A OMELO MUMBA ROAD RHODES PARK
City: LUSAKA
State/Province:
Country, Postal Code: ZAMBIA

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?

   A VERY HEALTHY POPULATION AS THE AREA BORDERS A NATIONAL PARK. ONLY 1 OR 2 MALE LION ARE HARVESTED IN A YEAR. ONLY MALE LIONS OVER THE AGE OF 6 ARE HARVESTED IN ENSURED BY THE COMPANY, THE GOVERNMENT AND WILDLIFE DEPARTMENT.

   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?

   LICENSE FEE. $1000
   TROPHY FEE $15000

   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?

   IT IS A CONTRACTUAL OBLIGATION FOR SITATUNGA RANCHING AND SAFARIS TO FUND PART OF THE ANTI POACHING CARRIE OUT IN THE HUNTING AREA, WHICH IS OVERLOOKED BY THE WILDLIFE DEPARTMENT TOGETHER WITH THE COMMUNITY WHO ALSO CARRY OUT ANTI-POACHING FROM ADDITIONAL FEES PROVIDED BY SITATUNGA RANCHING AND SAFARIS SITATUNGA RANCHING AND SAFARIS HAS GONE ABOVE AND BEYOND THE CONTRACTUAL OBLIGATION BY EMPLOYING ADDITIONAL GAME SCOUTS AND PROVIDING VEHICLES TO PATROL THE HUNTING BLOCK.

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: Frankie Timmer Date: 1/20/19

    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.

All international shipment(s) must be imported 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).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: SITATUNGA RANCHING AND SAFARIS
   a. Years in business: 4 YEARS
   b. Name of company conducting hunt: SITATUNGA RANCHING AND SAFARIS
2. Name of concession: LUAWATA GMA Size in km²: 2200
   a. Land tenure: ✓ Government lease __ Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: 7 YEARS Can it be renewed? ✓ Yes __ No
   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: COMMUNITY INVESTMENT, ANTI POACHING AND COMMUNITY EMPLOYMENT
   d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: LUAWATA GMA - LUANGWA VALLEY - CHIPATA NEAREST CITY
   e. If the concession borders a national park, please provide the park name: NORTH LUANGWA
   f. Description of general and distinctive habitat features and any water features: MOPANI WOODLAND, HILLS, HOT SPRINGS
3. Are there any communities living in the concession? __ Yes ✓ No
   a. If so, estimated number of people or villages in the concession? _____
4. Are there communities bordering this concession? ✓ Yes __ No
   a. If so, estimated number of people or villages around the concession? 3000 FAMILIES
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	AVERAGE	2632	UP	GOVERNMENT
Lion				
Leopard				
Prey species				

6. Total employment number: 40
   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	-

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Trackers	6	
Anti-poaching scouts/rangers	8	
Other anti-poaching		
Cooks/housekeepers	6	
Community coordinators	1	
Managers	1	
Biologists		
Others: CAMP STAFF	16	

7. Number of staff employed in the off-season: 40

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	8	8	FULL TIME
Managers	1	1	FULL TIME
Maintenance	12	12	FULL TIME
Road opening/construction	40	40	PART TIME
Community relations personnel	1	1	FULL TIME
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: COMMUNITY SCOUTS - 60

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? BOTH

   c. Months during which anti-poaching patrols are conducted: EVERY MONTH

   d. Number of anti-poaching patrols per month: EVERY 10 DAYS

   e. Description of anti-poaching equipment, vehicles, etc.: FOOT PATROLS WITH STANDBY VEHI, RADIOS, GPS'S AND FIRE ARMS

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? NATIONAL PARKS, MAGISTRATES, COMPANY & COMMUNITY

   g. Do you offer rewards to poaching informants leading to arrest? ✓ Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? ✓ Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? US $

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
	$15000	$17000	$20000	

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? ✓ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? BY CONTRACT AND JOLANTARY CONTRIBUTION

c. Does the company provide game meat to nearby communities? ✓ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: 16 000 KG OF MEAT TO 1500 FAMILIES. OTHER 1500 RECEIVES FROM NEIGHBORING CONCESSION

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NATIONAL PARKS AND WILDLIFE DEP.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? WILDLIFE DEP.

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? $ 20 000 USD ANNUALLY. COMMUNITY DECIDES WHERE IT IS MOST NEEDED

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)			
-- hunting lion			
-- hunting elephant			

-- hunting leopard			

12. Dollar amount and percentage of the company's revenue from U.S. clients: _____

13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

    Signature: _____

    Name: _____ Title: _____

13: WE TRY AS MUCH AS POSSIBLE TO HARVEST OLDER / AGING ANIMALS. WE SPREAD OUT HUNTING OVER THE WHOLE AREA WITH NO SHOOTING POLICIES AROUND CERTAIN AREAS. WE INVOLVE THE COMMUNITY AND EMPLOY AS MANY AS POSSIBLE.
AT THE COMPANY'S OWN EXPENSE WE MAINTAIN AND PROVIDE WATER HOLES SEPERATE TO EXISTING OBLIGATIONS.

THE COMPANY ALSO CONDUCT ADDITIONAL PATROLS IF AND WHEN NEEDED, DESPITE THE HELP AND OBLIGATION TO THE WILDLIFE DEPARTMENT

Serial No. 555555

LEON

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0033536

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 21-06-2018 .....

DETAILS OF PERMIT HOLDER

Full name: Francis Gene Kimmes ..... NRC/Passport No: (b) (6) [redacted] .....

Tel/Mobile No..... E-mail address.....

Postal Address: Chalunga Harding & Squire ..... Residential Address: USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 2. ..... 3.....

Calibre(s) 1.: 375 H&H ..... 2. 300 WM ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0000826 .....

Hunting Type..... Non - Residents .....

is hereby authorised to hunt in ..... Mungomedzi .....Game Management Area,

..... Luwato .....Hunting block for .....days from.....

to..... (Dates inclusive)

Amount Paid. ..... 3150 ..... GRZ Receipt No. 0004033

DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
21 JUN 2018
EXTENSION
PRIVATE BAG 1, CHILANGA, ZAMBIA.

Official Stamp

C. Nkumuya
Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Original

LEON / LIMMER

NPW FORM 2

0000878
S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue..... Chilanga ..... Date of Issue..... 6/7/18

DETAILS OF LICENSEE

Full Name..... FRANKIE G. LIMMER ..... NRC No./Passport No..... (b) (6) [redacted]

Nationality..... AMERICAN ..... Age.....

Tel/Mobile No:..... E-mail.....

Full Name of Safari Company: Sitatunga Safaris .....

Certificate of Incorporation No. ..... Date of Incorporation.....

Postal Address..... Box 45K ..... Residential Address.....

Firearm Licence/Tourist Firearm Import No..... Calibre of Firearm..... .375

Type of Hunt.....

Any other relevant information, which may be considered in support of this application (e.g, previous hunting licences held or previous hunting experience.

The above named Safari Hunting Outfitter and its bona fide Clients are authorised by this licence under the guidance of the Professional Hunter to hunt the following Game and/or protected animals within the Game Management Area or hunting block specified hereunder and for the specified period and upon payment of the fees specified below:

Species of Animals	Number	Sex	Hunting Area	Hunting Period	*Fees - The Kwacha equivalent of US$*
Lion	1st	M	Lwawata	2018	4200
			0000132		
			0043582		

Total Animals fees paid - the kwacha equivalent of ..... US$ 4200
Concession Fees paid - the kwacha equivalent of ..... US$ —
Grand Total the kwacha equivalent of ..... US$ 4200

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
06 JUL 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

RCVD FEB 8 2019

(b) (6) [redacted]

(b) (6) [redacted]

1/20/19
DATE

PAY TO THE ORDER OF USFWS $ 100 00

One Hundred + no/100 DOLLARS

Photo Safe Deposit™ Details on back

REGIONS

FOR

Franklin Lummus

(b) (6) [redacted]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Jurgens	Travis	James	Mr

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)
(b) (6)

1.c. City	1.d. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Prineville	Oregon	(b) (6)		United States

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
Same as above

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 the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** 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)

11/19/19

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 a trophy 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 4-6 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.

   Travis Jurgens, (b) (6) [redacted] Prineville, Oregon (b) (6) [redacted]

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

   Travis Jurgens (b) (6) [redacted]

3. 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?

☒ 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.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthero Leo, Lion

b. Sex (if known). 1 Male, 1 Female

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:

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

South Africa, Northwest Province, Farm: Sandhurst Portion 1, R137 Tosca/ Bray Road, Tosca Town 8618, Vryburg District

b. Date wildlife was hunted:

July 5, 2018

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

Lew Harris Safaris, Morgan Harris

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 foreign export/re-export document]:

Moredow Taxidermy, R34 Vryburg Road, Schweizer-Reneke, 2780, Vryburg District, Northwest

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). Please see attached

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:
Business Name: ~~Unknown at this time~~ Moredow Taxidermy
Address: Farm Moredow
City: Schweizer-Reneke
State/Province: Northwest 2780
Country, Postal Code: South Africa 2780

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Estimated 25,000 in the country to include in captivity and in the wild

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, local community, or government?

Permit fee $170.00 to office in Nortwest. Trophy fees to outfitter and landowner $27,500. These funds were used to provide jobs for people in the local community such as trakers, skinners, cooks, maids, maintenance people and so on. The funds were also used to enhance habitat by providing/ creating addtional watering holes. Funds were also used to assist with anti-poaching patrols.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

The funds were also used to enhance habitat by providing/ creating addtional watering holes. Funds were also used to assist with anti-poaching patrols.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 1/29/19

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 governments 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 shipments 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).

Portland, OR
PDX

DRSM 00575/6/2018 NW 3606/06/2018 Application ID 3606

Biodiversity North West Integrated Permit Ordinary Hunt, Release .375 Caliber Hunt Dangerous Game

North West Province

Issued in terms of the provisions of:
The National Environmental Management Biodiversity Act, Act 10 of 2004 as amended

Issued in terms of the provisions of:
(1) Bophuthatswana Nature Conservation Act, Act No.3 of 1973; (2) Transvaal Nature Conservation Ordinance, No.12 of 1983; (3) Cape Nature and Environmental Conservation Ordinance, 19 of 1974.

APPROVED SPECIES AND NUMBERS, RESTRICTED ACTIVITIES AND CONDITIONS AS PER ADDENDUM AND PAGES ATTACHED

PERMIT HOLDER

Details
Surname: Jurgens
Name: Travis James
Id Number:
Passport: (b) (6)
Cell Home:
Tel Home:
Tel Work:
Fax Home:
Email: sabrina@tinashegroup.co.za

Physical Address
Building:
Street: (b) (6)
Suburb: Prineville
Town: Oregon
Area Code: (b) (6)
Division/Region:
Province/State:
Country: United state of America

Postal Address
Post Office:
Town:
Postal Code:
District/Region:
Province/State:
Country:

REGION
NorthWest

LOCATION

Facility

Property
Property Name: Sandhurst Portion 1
Building: Tinashe
Street: R137 Tosca / Bray Road
Suburb: Tosca
Town: Tosca
Area Code: 8618
Division/Region: Vryburg District
Province/State: North - West
Country: South Africa

CONSERVATION PERMIT OFFICE
NW WEST PROVINCE
20 Jun 2018, 11:38 AM
2639 Mmabatho 2735
Tel: +27(0)18 389 5130

Stamp of Issuing authority

VALIDITY PERIOD
FROM 27/06/2018 TO 26/06/2019

Stamp if applicable

Permit holder / Dealer

Signature of Issuing Authority
(Bonho Hanganya)
20 Jun 2018, 11:38 AM

Signature of Permit Holder
(Travis James Jurgens)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdanga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

DRSM 00575/6/2018 NW 3606/06/2018 Application ID 3606

PROPERTIES

Name	Town	Province	Country
Sandhurst Portion 1	Tosca	North - West	South Africa

SPECIES INFORMATION

Scientific Name	Common Name	Number	Gender	Markings
Panthera leo	Lion	2	Both (Male and/or Female)	1 Brown Male 1 Brown Female

PROFESSIONAL HUNTERS

Full Name	PH Number	Cell Work	Tel Work
George Clayton Fletcher	PH-105/12/2017NW	0823393124	0823393124

HUNTING OUTFITTERS

Full Name	HC Number	Cell Work	Tel Work
George Clayton Fletcher	HO-045/12/2017NW	0823393124	0823393124

FOREIGNER INFORMATION

Full Name	Passport	Arrival	Departure	Physical Address
Travis James Jurgens	(b) (6)	29/06/2018	02/07/2018	(b) (6) Prineville, (b) Oregon, Oregon, United States of America

OTHER PARTIES INVOLVED

Full Name	ID Number	Contact	Involvement	Physical Address
Hilgard Kotze		Cell:0827845269	Transport 1 Hunted Male lion ,1 Female Trophy to the taxidermy	Moredow Taxidermy, R34 Vryburg Road, Schweizer - Reneke, 2780, Vryburg District, North - West

ACTIVITIES

Activity Name
Hunt
Release

METHODS

Method Name
.375 Caliber

STANDARD CONDITIONS

GENERAL CONDITIONS - ALL PERMITS

1) The Issuing Authority for this licence is : The Northwest Department of Rural,Environment and Agricultural Development (READ), Chief Directorate Environmental Services, Private Bag X 2039, Mmabatho, 2735, hereafter named "the Issuing Authority". 2) This permit, unless otherwise stated, is only valid within the boundaries of the North West Province (hereafter named "the Province") and then specifically as specified on the permit. 3) This permit is valid only : - a) for the specific species, sex and numbers as specified on this permit. b) for the specific activity / activities authorised. c) for the specified methods or instruments authorised. d) for the specific property / locality as specified. e) for the specific day, time or period stipulated. 4) This permit is only deemed valid : - a) in the original format and with the content as issued by the Issuing Authority. b) once it has been printed and the signature of the permit holder has been endorsed thereon in ink. 5) the Issuing Authority reserves the right to amend, withhold, withdraw or cancel any permit at any time. 6) This permit is not transferable to any individual, natural person, juristic person or any other legal identity. 7) Any alterations or attempt thereto, whether electronically or in any other way, shall immediately render it invalid. 8) This permit shall lapse and be deemed invalid when it is altered, lost or destroyed and no copy thereof shall be issued. 9) This permit shall also become invalid as soon as the permit holder loses possession of any animal, plant or derivative as the case may be, as specified on the permit. 10) This permit does not grant the permit holder automatic access to any Protected Area, National Park, Provincial Nature Reserve or privately owned land and : - a) the permit holder must beforehand obtain all other relevant written permissions, documents, rights and licences. b) the permit holder must comply with any other / further conditions or restrictions that the manager / landowner may stipulate at his / her discretion. 11) The permit holder must at all times while performing any restricted activity authorised by this permit, have the permit and all other relevant documentation in his / her possession and without delay make it available upon request by any authorized person. 12) The authorized person must also be allowed access onto the property at any reasonable time for any inspection needed and can remain on such property as long as it is needed to do the inspection. 13) The permit holder must immediately after completion of any activity authorised by this permit, record the required particulars in the space provided therefore or on the annexure or document attached hereto or in the prescribed register related to the permit. 14) The permit holder must return the original signed permit to the Issuing Authority within (14) fourteen days : - a) after performing or completing the authorised restricted activity, or b) after the date of expiry thereof whichever happens first, and c) if applicable furnish the Issuing Authority with a prescribed written feedback report on the results of every activity conducted. 15) The permit holder must retain a copy of the permit together with all other relevant written permissions, documents, rights and licenses for a period of at least (2) two years from date of issue or for as long as the permit holder is in possession of the animal, plant or derivative, whichever period is the longer. 16) If applicable, the permit holder shall apply for the renewal of the permit to the Issuing Authority, on the appropriate application form, at least (3) three months prior to the expiry date thereof. 17) Applications for renewal of this permit will only be processed after the original signed permit together with the prescribed written feedback report has been returned to the Issuing Authority. 18) This permit, during the period of validity thereof, is also subject to: - a) all applicable norms and standards in existence at the time of issuance. b) the provisions of any law in force, in respect of the specific species, activity, method or instrument to which this permit applies. 19) It is the permit holder's responsibility to obtain the correct information on any other legislation, specification, requirement or changes thereto that may be applicable or are required by any other Issuing Authority / Organization / Institute, relating to this permit. 20) By signing this

Signature of Issuing Authority
(Boriho Manganye)

20 Jun 2018, 11:38 AM

Signature of Permit Holder
(Travis James Jurgens)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdanga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735

permit, the permit holder declares that he / she is aware of the fact that : - a) any transgression or failure to return the original permit or failure to render the required reports can lead to criminal prosecution and also jeopardize any future applications by or in the name of the permit holder. b) if the permit holder contravenes or fails to comply with any permit condition or requirement, he / she shall be guilty of an offence. 21) The prescribed fees paid to the Issuing Authority for the issue of this permit shall not be

HUNT - DANGEROUS GAME

1) The permit holder must ensure that : - a) a fire-arm having a barrel caliber of at least 9.525 mm H&H (.375 of an inch H&H) is used to hunt buffalo, elephant, lion, leopard, rhinoceros or hippopotamus. b) the client is escorted by preferably two registered professional hunters who are qualified to hunt the above mentioned dangerous wild animals. c) unless approved and specified on this permit, no prohibited hunting method or instrument is used to hunt an animal. d) the animal which is hunted, is not a "put and take animal" since the animal must qualify as free ranging (wild) for at least a period of twenty four (24) months prior to the hunting thereof. e) no hunting of rhinoceros or lion takes place unless a representative of the relevant nature conservator appointed by the Issuing Authority, is present. f) any official who attends the hunt has the full right to defend himself / herself as well as anybody else, should an emergency situation arise and such official is not held liable for any damages / claims in this regard.

HUNT - STANDARD REQUIREMENTS

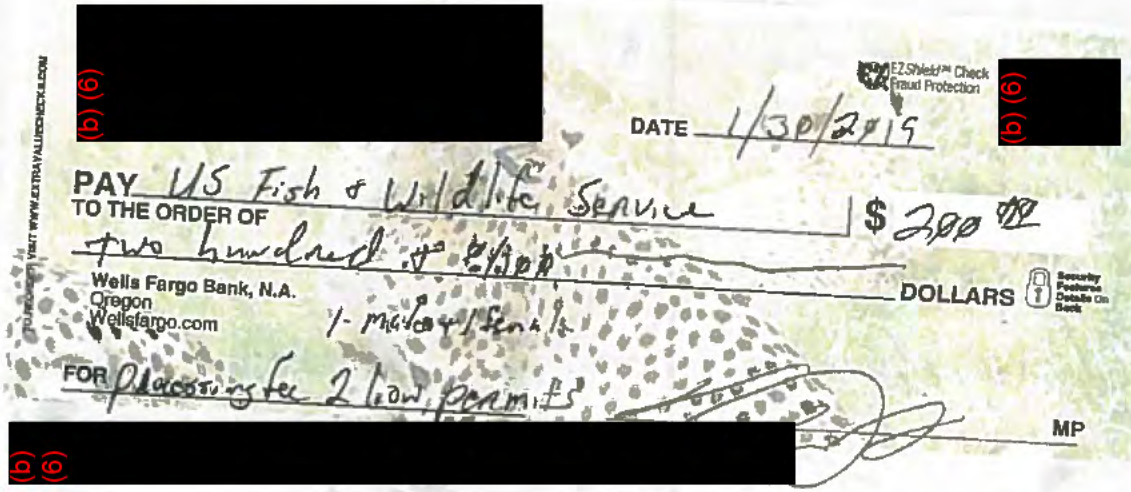
1) The permit holder when prohibited by any applicable legislation, may NOT use any prohibited methods or instruments to hunt, capture or catch any wild animal unless he / she has obtained a special permit authorising him / her to do so. 2) The permit holder may NOT use : - a) a fire-arm having a barrel of a caliber of 6.5 mm (.256 of an inch) or less, to hunt any eland, kudu, blue wildebeest, black wildebeest, gemsbok, red hartebeest, roan antelope, sable antelope, Burchell's zebra, Cape mountain zebra, Hartmann's mountain zebra, nyala, or water buck unless authorised in the restricted activities. b) a fire-arm having a barrel caliber of less than 9.525 mm H&H (.375 of an inch H&H) to hunt any buffalo, elephant, lion, leopard, rhinoceros, hippopotamus or giraffe unless authorised in the restricted activities of this permit. 3) The permit holder must : - a) obtain the written permission as prescribed in applicable legislation, from the landowner to hunt on the property of the landowner and, b) obtain the written permission as prescribed in applicable legislation, from the landowner to remove the carcass from the property of the landowner. 4) When the permit holder kills any wild animal, he / she shall, before leaving the above-mentioned property (or if he / she does not leave it, after each days hunt) record in the space provided on the hunting license and / or written permission the particulars regarding the date, species, sex and number of each wild animal, or if it is impossible to distinguish the sex, the total number of each species of such wild animals which has been killed. 5) If the permit holder belongs to any hunting organisation, the hunt is conducted in the hunting area according to the code of ethical conduct and good practice, as supported by such organised hunting fraternity. 6) The responsibility to comply with all permit conditions, will reside with the permit holder and landowners of the properties assisting the permit holder.

Signature of Issuing Authority
(Borho Manganye)

20 Jun 2018, 11:38 AM

Signature of Permit Holder
(Travis James Jurgens)

North West Department of Rural, Environment and Agricultural Development. (READ), Cnr. Dr. James Moroka Drive & Stadium Road, Mmabatho
Contact Information: Tel:+27 (0)18 389 5130, Fax:+27 (0)18 389 5130, E-mail:jdenga@nwpg.gov.za
Postal Address: Private Bag X 15, Mmabatho, 2735


(b) (6)

(b) (6)

EZ Shield™ Check Fraud Protection

(b) (6)

DATE 1/30/2015

PAY US Fish & Wildlife Service

TO THE ORDER OF

$ 200 00

two hundred & 00/100

DOLLARS

Security Features Details On Back

Wells Fargo Bank, N.A.
Oregon
Wellsfargo.com

1- Mckay Ferris

FOR Processing fee 2 low permits

MP

(b) (6)

TO REORDER VISIT WWW.EZSTRAYALLCHECKS.COM

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Facchina	Robert	Aloysius	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
New Hope	PA	(b) (6)		USA
2.a. Mailing address (include if different than physical address, include name				
Same as Above				
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 the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. 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)

Октября 14 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 a trophy 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 4-6 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)?

   Robert A. Facchina (b) (6) [redacted]

3. 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?

☒ 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 - 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:

N/A

b. Date wildlife is to be hunted:

N/A

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

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

Unit One, Matetsi Safari Area, Matetsi, Zimbabwe. Nearest "city" Victoria Falls. GPS coordinates 263.039

b. Date wildlife was hunted:

Hunt dates were October 26, 2018 thru November 12, 2018

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

Outfitter MABALENGWE SAFARIS, Safari Company COLLECT AFRICA LTD, Professional Hunter CLIFTON WALKER LICENCE NO: 402

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 foreign export/re-export document]:

Trophy Consultants International, 4 Josiah Chinamano Road, Belmont, Bulawayo, Zimbabwe

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). See attached Hunting Permit issued by Zimbabwe National Parks and Wildlife Authority

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:	
Business Name:	Trophy Consultants International
Address:	4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

Information not available to me.

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, local community, or government?

Information not available to me

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Information not available to me.

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: 12-14-2018

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 governments 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 shipments 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).

Att 24/10/19 1120

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05)
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081328
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Mabal`engwe Safari & Tours	Client's Full Name	Robert Facchina
ZTA (HOP) No.	HOP0251	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	5 Hoopoe Hollow Rd, Burnside, Byo	Address	(b) (6) New Hope, Pennsylvania, USA
Name of Professional Hunter	CLIFTON WALKER	Licence No.	402
Telephone		Fax	N/A
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Name of Foreign Agent	TROMBERG HUNTING	Address	25 Mowen St Vineta Swakopmund NAMIBIA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Matetsi Safari Area - Unit 1	Matabeleland North	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	26-10-2018
Date of Safari To	12-11-2018
Daily Rate Charged For Big Game USD	800.00
Daily Rate Charged For Plains Game USD	400.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
ZPWMA
Date Stamp
1 OCT 2018
P BAG 5926
VICTORIA FALLS

3. DETAILS OF DEPOSITS

(All Inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(I) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(II) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate

Less Commission

Other fees (Incidentals)

Percentage Commission Charged

Total Guests rate

Total Trophy fees

Grand Total USD

Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	GIRAFFE	M	K	UNIT 1	146056	26/10/18		
2	WATERBUCK	M	K	UNIT 1	142495	27/10/18	77,25	
3	ZEBRA	M	K	UNIT 1	177504	27/10/18		
4	LION	M	K	UNIT 1	263039	29/10/18	17,95	
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
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22								
23								
24								
25								
26								
27								
28								
29								
30								

I ROBERT FACCHINA hereby certify that the information given in this return is, to the best of my knowledge, true and correct.

Signature of Foreign Client _____ Date 31-10-18

Signature of Professional Hunter _____ Date _____

Signature of Safari Operator _____ Date 31OCT18

Zimbabwe Parks and Wildlife Management Authority
P.O. Box CY140, Causeway
Harare, Zimbabwe
Tel: 263-4-706077/8
Fax: 263-4-726089
E-mail: natparks@africaonline.co.zw
Website: www.zimparks.com

TAX INVOICE № 34781

VAT REG: 10018005

THE ACCOUNTS
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
01 NOV 2018
P. BAG 5926
VICTORIA FALLS

PAGE NO:
INVOICE NO:
DATE: 01/11/18
ORDER REF:
ACCOUNT NO:

CUSTOMER DETAILS
Mabalengwe Safaris Unit One

INVOICE TO	DESCRIPTION	PRICE	QUANTITY	UNIT	AMOUNT	VAT	TOTAL AMOUNT
Robert	Giraffe (m)	850-00	01		850-00		850-00
Facchina	Waterbuck (m)	850-00	01		850-00		850-00
	Zebra	550-00	01		550-00		550-00
Trail 2	Lion (m)	5000-00	01		5000-00		5000-00
Number C81328	Seven thousand two hundred and fifty dollars						
	Please not the amount shown as to be paid within fourteen days to be deposited in our Nostro FCA Account						
	NB: Nostro FCA (Domestic) Acc Name - Parks & Wildlife Bank - ZB Bank Acc No - 4304-705420-406 Branch - Belmont Bulawayo						
			GRAND TOTAL		7250-00		7,250-00

Signed by: Rwombe M [signature]
Date: 01/11/18

BROOK TROUT
ROBERT A FACCHINA
(b) (6)
NEW HOPE, PA (b) (6)
(b) (6)
12-14-18
Date
PAY TO THE ORDER OF
US FISH + WILDLIFE SERVICE
$ 100 00
ONE HUNDRED
Dollars
BANK OF THE WEST
BNP PARIBAS
For CITES - LISA - ZIM
(b) (6)
WILDLIFE FOR TRUSTED

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

FEB - 1 2019

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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HOMYACK	STEVEN	(NMN)	(b) (6)

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

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 #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ROBESONIA	PA	(b) (6)		U.S.A.
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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. 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.

(b) (6)

Signature of applicant/Principal Officer [redacted] (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

12/19/2018

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 a trophy 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 4-6 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)?

   STEVEN HOMYACK (b) (6)

   (b) (6) [redacted]

3. 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?

☒ No ☒ ~~Yes~~ (NO)

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.

4. 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

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:

      SOUTH AFRICA
      NA VORSTERSHOOP NORTH WEST PROVINCE
      DR. RUTH SEGOMOTSI MOMPATI DISTRICT
      VORSTERSHOOP PORTION 109

   b. Date wildlife is to be hunted:

      DELETE GH NA 09/09/2017 BEGIN

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

      NA SOMERBY SAFARIS

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, 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 was removed from the wild:

      SOUTH AFRICA
      VORSTESHOOP NORTH WEST PROVINCE
      DR RUTH SEGOMOTSI MOMPATI DISTRICT
      VORSTERHOOP PORTION 109

   b. Date wildlife was hunted:

      11/09/2017 BEGIN

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

SOMERBY SAFARIS

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 foreign export/re-export document]:

UNIVERSAL TROPHY SERVICES
PLOT 114
BASHEWA, PRETORIA
0056
SOUTH AFRICA

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). COPIES ATTACHED

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: RUPERT DEDEKIND
Business Name: UNIVERSAL TROPHY SERVICES
Address: PLOT 114 BASHEWA
City: PRETORIA
State/Province:
Country, Postal Code: SOUTH AFRICA, 0056

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (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 for 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?

ROBIN/SMALDEEL, THEUISSEN, VRYSTAAT, 9410

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, local community, or government?

ANSWER ON ATTACHED PAGE.

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

PLEASE FIND ATTACHED LETTER FROM THE HUNTING ORGANIZATION AS "SAPA LETTER".

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 an elephant trophy, I understand that my client may import no more than two elephant 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 an elephant trophy, I understand that I may import no more than two elephant trophies in (b) (6) lendar year.

    Applicant's signature: [signature] [redacted] Date: 12/19/2018

    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 governments 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 shipments 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).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

NO: 54047

Professional Hunters' Association of South Afri

Duration of Hunt: Commenced 12 / 07 / 2017 Terminated 12 / 09 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
				X				

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: S.S. van Rensburg

Business Address: Farm Montrose

Petrus St

Code: 9515

ID No: 5301175044087

PH Permit No: 076/10/2016 NW

Date: 12/09/2017 Signature:

CLIENT

Name: Steven [redacted]

Permanent Postal Address: [redacted]

Code: PA [redacted]

Country: [redacted] Tel/Fax

Passport No: [redacted]

Email

Date: 12/09/2017 Signature:

HUNTING OUTFITTER

Name: L.L van Rensburg

Business Address: Farm Montrose

Petrus St Code: 9515

ID No: 5301175044087

Tel No: 083 260 2234 Fax No

HO Permit No: 035/10/2016 NW

Date: 12/09/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
B180/55122150591086	K. RSM	L.L. Rens Farm Montrose Petrus St 9515	12313	11/09	Lion	1		1	Full mount Hide, Horn, Penis
				11/07	Leopard	1		1	

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies. Client Original White

1st Copy Pink Forward to Nature Conservation Authority where hunt took place

Hunting Outfitter 2nd Copy Blue Retain for a period of three years

Taxidermist 3rd Copy Green Taxidermist

Professional Hunter Last Copy Yellow Remains in book

NB: Voluntary conservation contributions for ev taken would be appreciated. These funds g wildlife conservation, the upliftment of con research projects and m

QUESTION

QUESTION 7

The DEDECT

Department:
Economic Development, Environment, Conservation and Tourism
North West Provincial Government
Republic of South Africa

OK Building
Market Street
P.O Box 112,
Vryburg, 8600

ENVIRONMENTAL SERVICES
BIODIVERSITY MANAGEMENT AND CONSERVATION

Tel: (053) 927 1809
Fax: (053) 927 2904
ehorn@nwpg.gov.za

STATEMENT BY THE HUNTER, PROFESSIONAL HUNTER AND LANDOWNER

HUNTING OF CAPTIVE BRED LIONS IN THE NORTH WEST PROVINCE

HUNTING PERMIT NUMBER: 012313

Name of Hunter, Home address, Tel Number and Passport / ID number

Steven Hornyeck: pp (b) (6)

(b) (6)
Robesonia
PA (b) (6)
USA

Outfitter: Name & North West permit number

GG van Schalkwyk

Prof Hunters: Name & North West permit number of the two (2) PH's conducting the hunt

GG van Schalkwyk

T.J. Prinsloo

Description of animal Sex, Age, Origin (Docs e.g. Transport, Keeping & Import) and exact date and time released

1 x male lion

Release : 07/09/2017

Vorstershoop farm, Camp B

QUESTION 7

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

2030 NDP

Cnr. Mokopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES
DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

Ordinary Permit No: O 12313

Please familiarise yourself with this terms and conditions.
The permit is not transferable.
This permit shall be subject to the provisions of any law in force during the period of validity of the permit.
The Hunter or Landowner who contravenes or fails to comply with any one of the conditions or requirements, to which this permit is subject, shall be guilty of an offence.
This permit only authorises the hunting of the animal during the day.
The Hunter will ensure that this permit is immediately available during the hunt.
The lion must be released in the hunting area a minimum of 96 hours prior to hunt and after receiving a permit to do so.
Information requested on this permit shall be done in ink and in print. False and unreadable information will cause this permit to be invalid.
No person shall hunt the wild animal or may be allowed by a landowner to hunt if the hunter did not beforehand acquire the necessary hunting skills and firearm training to: i) Ensure the safety of him or herself, other people and non targeted species. ii) Ensure a hunt which consists of generally accepted sound hunting ethics, a fair chase, the minimum cruelty and damage to the ecology of the hunting area.
No person may hunt when under the influence of alcohol or any substance that may deter his/her vision, judgement or in any way negatively affect his or her conduct.
A Hunter will immediately report the wounding of any wild animal to the landowner or his representative and will be responsible for the tracking down and killing thereof. If there is reasonable chance that the animal pose any threat to property or human life, the hunter and the land owner will immediately notify both the nearest Police station and the Local Nature Conservation district officer.
The landowner may at any time stop the hunt and withdraw the permit.
A Hunter should be accompanied by a designated official from this Directorate.
Animals may not be hunted under the influence of drugs.
Only animals that have been declared as wild by this directorate may be hunted. (No tame animals may be hunted)

QUESTION 7

read
Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

Cnr. Molopo & Noord
Mini Garona Complex
Private Bag x34
Vryburg
8600

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: Biodiversity Management

Tel: +27 (53) 928 0644
Fax: +27(86) 511 4213
atalakasi@nwpg.gov.za

ORDINARY PERMIT: O 12313

(ORDINARY TROPHY OR PARTS TRANSPORT PERMIT CONDITIONS)

This permit authorises the transport of the Trophy or parts of the animal of the hunted animal from the venue of hunting to the approved venues of activity as specified on the permit.
This permit does not authorize the **selling, possession, exporting, importing** of the **Trophy** or part/s specified on the permit.
This permit is not transferrable.

PLEASE OBSERVE PERMIT CONDITIONS AT ALL TIMES

Ms. A V Talakasi
Permit Officer
Biodiversity Management
Dr. Ruth Segomotsi Mompati District
North West Province

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2017 -09- 05
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

QUESTION 7

No hunting with dogs is allowed.
Hunting must be done on foot and from at least 200m from the vehicle (Except in the case of disabled hunters)
No animal may be artificially lured by sound, scent, visual stimuli, feeding bait, other animals of its own, another species or any other method.
Hunting may not take place nearby any other lions kept in captivity.
The Hunting party may not be more than 5 people.
Hunting of a lion in a pride situation is prohibited.
No Lion may be captured, kept in captivity and then released for the purpose of hunting.
If the captive bred lion/s will be darted / immobilised for the purpose of capturing , release and/ or transport, the following must be noted:- - Darting / immobilisation may only be done by a registered Veterinarian. - The responsible Veterinarian must be TOPS registered and have a valid permit to conduct restricted activities i.t.o the TOPS regulations. This permit is subject to the responsible Veterinarian whom will perform the darting / immobilisation, to the Vryburg Conservation Office. A Nature Conservation Official must be present during the release and hunting of the lion. Please notify the Vryburg Conservation Office at least 3 working days prior to activity of the exact date and time of the planned activity. **Tell: 053 928 0656 or \071 889 7867\082 446 1816**
This is an integrated permit issued in terms of the provisions of the TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINACE 19/74, BOPHUTHATSWANA NATURE CONSERVATION ACT 3/1973 AND 90(1)(a)(i)(ii)(b)(c) of the Biodiversity Act, Act 10 of 2004 and Regulations 10, 18 and 44 of the TOPS Regulations.

Signature of Issuing Officer: _____ Date: 05/09/2017

Signature of hunter: _____ Date: 11/09/2017

Signature of land owner: _____ Date: 11/9/2017

Signature of PH: _____ Date: 11/9/2017

Department of Rural, Environment and Agricultural Development
Dr Ruth Segomotsi Mompati District
2017 -09- 05
Private Bag x 34, Vryburg 8600
NORTH WEST PROVINCE

QUESTION 7

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

PERMIT NUMBER: O 1231 3

READ

NAME OF ISSUING AUTHORITY	
NAME	MINI GARONA OFFICES
ADDRESS	MOLOPO & NOORD STR
ADDRESS	VRYBURG
PROVINCE	NORTH WEST PROVINCE

DETAILS OF PERMIT HOLDER

NAME	Steven	ID NO.	
SURNAME	Hornyack	PASSPORT NO.	(b) (6)
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	(b) (6)		
ADDRESS	Rubesons		SAME
ADDRESS			
TOWN	PA (b) (6)		
POSTAL CODE			
PROVINCE	USA		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	WD Botha
NAME AND SURNAME : RESPONSIBLE PERSON	WD Botha
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Farm Norsleishoop Camp B
PHYSICAL ADDRESS OF FACILITY	Norsleishoop
DISTRICT	Dr RSM
PROVINCE	North-West
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Lion	Panthera leo	Male	01	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Release on 07/09/2017 at 07h00 and hunt from 11/09/17 at 07h00 Hunt one (01) Captive bred male lion of the farm Norsleishoop Camp B. and

N/A

NAME AND SURNAME OF PURCHASER / SELLER	N/A
RESIDENTIAL ADDRESS OF PURCHASER / SELLER	

IN THE CASE OF INTERNATIONAL IMPORT / EXPORT:

NAME AND SURNAME OF CONSIGNEE / CONSIGNOR	N/A
RESIDENTIAL ADDRESS OF CONSIGNEE / CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (If applicable)	S Hornyack
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	GG Van Schalkwyk
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	GG Van Schalkwyk
WEAPON AND METHOD OF HUNTING	Rifle 416 Rigby. Heat Stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	N/A
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 07/09/2017	TO:	06/10/2017
RECEIPT NUMBER	R 24000.00 CM		
SIGNATURE OF ISSUING OFFICER:	Department of Rural Development and Agricultural Development Dr Ruth Segomotsi Mompati District	SIGNATURE OF PERMIT HOLDER:	
DATE STAMP:	2017 -09- 05		

9.b.

The trophy fees for this is $12,500. A $1500 of that amount is for the permit and license fees.

Included in the $11,000 that is left, all expenses for instance, traveling to the Kalahari, paying the PH his daily fees, skinners, trackers, employees at the lodge, etc are all included in the $11,000. We pay a substantial membership fee annually to belong to the Professional hunters Association of South Africa (PHASA) and PHASA does a lot of community work.

We can't say from this specific lion-this is where we donated the money to. We use all the trophy fees for all animals hunted in general during the year to take care of families in need, help schools with learning materials, donating clothing to orphanages, etc.

The landowner must regularly, in his own capacity, get involved in community and socially uplifting work for instance donating to schools, etc. (please find attached a letter from a school where the outfitter donated.

Nature Conservation use the funds to pay the salaries of the workers that are working with the permit applications. Their job is to capture the applications and to issue the permits and to keep track of all the animals that have been hunted, the quotas still left, etc. The department of environmental affairs use some of the permit fees for conservation in national parks. –Somerby Safaris

Our group brought 6 large boxes of school supplies and donated them to a preschool. While in S.A. we also purchased 2 dozen pairs of shoes and a refrigerator that we also donated to the school.

-Steven Homyack Jr.

9.b.

Moreleta Park, 726 Biddy Street
moreletaparkpreschool@gmail.com
Natasha Botha 073 592 1560 /
Marga van Wyk 082 524 9193

13 August 2018

Dear Chris Botha (Kalahari Pride Safari)

On behalf of Moreleta Park Preschool, We want to extend a heart-felt thank you for your support and sponsorship to making this golf day so successful. The vibe was incredible and we are so grateful for everyone's contribution, fun attitude and encouragement!

Your generous contribution helped make our vision a reality by making it such a huge success. We will now be able to fix the damaged caused by the rain storm.

This was our first golf day, but definitely not our last. We are already busy planning our next golf day for 2019 and would love you to be part of it again. We will let you know early in 2019 what date we chose. Hope you will be part of it again and even see you there.

Sincerely,

Natasha Botha and Marga van Wyk
073 592 1560 / 082 524 9193
Moreletapark Preschool
Moreletaparkpreschool@gmail.com

9c

SAPA

Postnet suite 164
P Bag X 1288 Potchefstroom
2523

Tel 0836168104
sapaceo@sapredators.co.za

To : To whom it may concern
Re : Motivation of support to apply for export of lion trophy Dr Steve Hornyack

The application to export the trophy is supported by SAPA. The hunt was conducted on a SAPA accredited farm Vostershoop. This implies that the supplier of the animal and the presentation of the hunt was done in terms of the SAPA norms and standards as approved by the SAPA executive. The farm is submitted to a disciplinary process and regular audit.

The landowner also contributed a significant amount to the SAPA conservation fund. This indicate that money generated by the hunts also contributed to the conservation of the lion as a specie. The lion biodiversity management plan document serve as basis of all decisions made on the breeding and hunting of lion. SAPA is the author of this document and present it as proof of the commitment to conservation of the African lion.

The African lion is an iconic predator species. However, lion populations in most of Central and Northern Africa have become extinct and populations in Eastern and Southern Africa are under pressure. Serious and urgent efforts are required to reduce the threat to African lion populations in the wild.

The South African Predator Association (SAPA), on behalf of the captive lion industry in South Africa, recognizes that it has a special responsibility towards contributing to the survival and wellbeing of "wild" lion populations. To achieve this, SAPA has established a Conservation and Development Fund. The main aim of the Fund is to facilitate the lion industry's contribution to the conservation of wild African Lions and other predator populations.
The establishment of the Fund was approved by all SAPA members during the Annual General Meeting of Nov 2015 and confirmed by the SAPA Council meeting of 12th of July 2016.

The objectives of the Fund are:

1.1 to support approved lion/predator conservation projects;
1.2 to support approved lion/predator research projects;
1.3 to support approved projects to establish lions/predators in the wild;
1.4 to support approved social upliftment, development and educational projects in communities associated with lion/predator populations; and
1.5 to finance operational and administrative activities required by the above mentioned activities

Together with other members of this fund Mr Chris Both was instrumental to raise 1.2 Million rand for the conservation fund. This money is now at the disposal of the technical committee to evaluate appropriate projects to fund. He also donated funds to a pre-primary school of his choice.

Deon Swart
CEO SAPA
10.12.2018

SAPA

SOUTH AFRICAN
PREDATOR ASSOCIATION

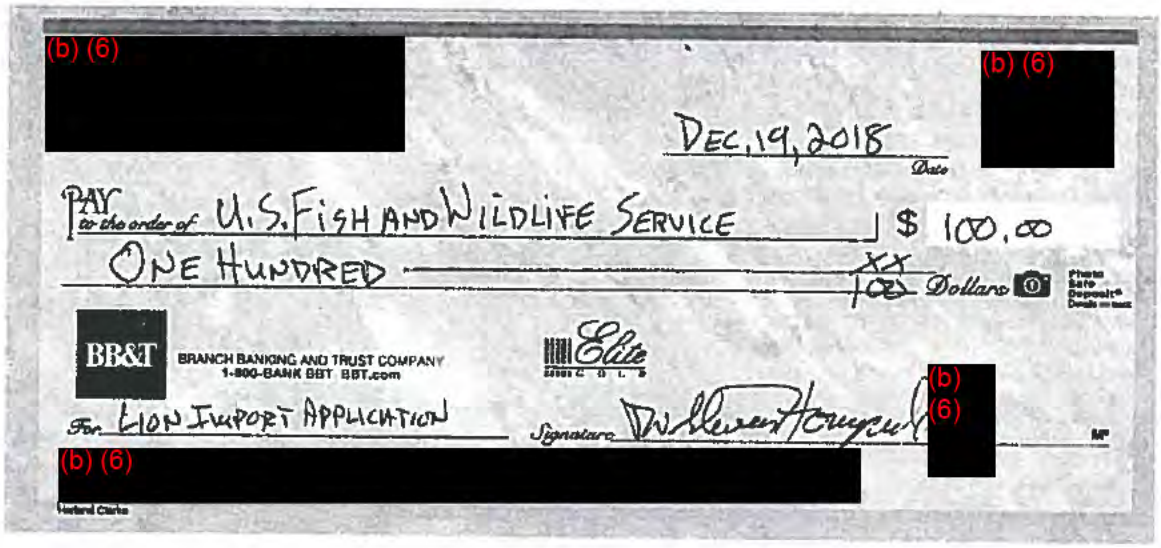
Herewith SAPA certify

Chris Botha

As a member of good standing with full voting membership of SAPA
for the year 2018

13/8/2018

K. Nematendani
President
SA Predator Association


(b) (6)
(b) (6)
DEC, 19, 2018
Date
PAY to the order of U.S. FISH AND WILDLIFE SERVICE
$ 100.00
ONE HUNDRED XX/100 Dollars
BB&T
BRANCH BANKING AND TRUST COMPANY
1-800-BANK BBT BBT.com
Elite
For LION IMPORT APPLICATION
Signature
(b) (6)
(b) (6)

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
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

RCVD MAR 27 2018

Form 3-200-29

OMB Control No. 1018-0093
Expires Rev 08/31/2020

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cunningham	Samuel	(b) (6)	na

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. 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) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Amarillo	Texas	(b) (6)		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
same	same	same	same	same

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. 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): 03/19/2018

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:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) 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
(4) 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 regular mail through the U.S. Postal Service.

   Same

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

   Applicant or attorneys with Conservation Force, 504-837-1233, cf@conservationforce.org

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 X 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.

na

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Panthera leo (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:

   South Luangwa, Zambia in Nyamvu and West Petauke GMA, Nyimba is closest town

   b. Date wildlife is to be hunted: 09/23/2019-10/15/2019

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

   WH van Noordwyk, Nyamvu Safaris and Mopane Safaris

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:

   na

   b. Date wildlife was hunted: na

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

   na

   c. 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]:

   na

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).

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: Douglas Cockroft
Business Name: Splitting Image Taxidermy
Address: PO Box 27582, Greenacres
City: Port Elizabeth
State/Province: East Cape
Country, Postal Code: South Africa 6057
Telephone: +27 41 811 9729 email: info@splitimagetaxidermy.co.za

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?

   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?

   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?

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**). I understand that my client may only import two leopard trophies and two elephant trophies within the same 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: _____

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**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: _____ Date: 02/19/2018

    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.

All international shipment(s) must be imported 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).

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 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: _Samuel James Cunningham _____

Date: 03/19/2018

NYAMVU SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: ZAID137@HOTMAIL.COM

I. DESCRIPTION OF COMPANY AND CONCESSION

Nyamvu Safaris, Ltd. has been operating Nyamvu Game Reserve since April 2005. The Game Reserve provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant and is also a None Fenced Game Reserve but open and wild like all other hunting blocks in Zambia. The Game Reserve is in Nyimba District in Eastern Province of Zambia. The Area is along the Luangwa River. Nyamvu Safaris has entered into a Long term project with the Wildlife Authorities to try and develop a Game Reserve for Animals for a period of Ninety Nine years.

The Director of Nyamvu Safaris is Mr. Zaeed Patel. Nyamvu has permanent employees who work throughout the year and are on two year contracts that are renewable. The camp has a resident Professional Hunter and a camp Manager. Other employees include four game trackers, nine anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 113 people to be direct beneficiaries from Nyamvu Safaris employees. These beneficiaries come from the local community.

When Nyamvu Game Reserve was acquired in 2005 the Area was completely depleted such that even seeing an Impala was almost impossible. It had to take frantic efforts by Mr. Zaeed Patel to begin the Anti-Poaching Patrols and then creating water points for animals to access water easily. Slowly the animals started coming back to Nyamvu Game Reserve and as we speak today after 10 years of progressive anti-poaching and creation of suitable conditions for Animals Nyamvu is now home to most of the wild species of Southern Africa including Elephant, Lion and Leopard. The director of Nyamvu has even carried out a restocking exercise of Sable Antelope which originally was not there. We can confirm that Nyamvu now has enough sable that can even be included on Safari Quota to be hunted. The restocking exercise is not only limited to sable only but other species as well.

Among the many efforts done to improve the number of animals in Nyamvu include provision of salt Leaks, provision of Maize Bran, creation of Dams for easy accessibility of water are among the many efforts done to create suitable conditions for Animals to stay in Nyamvu.

We further wish to put it on record that Nyamvu Game reserve is an Area where the director has invested heavily to make it what it is today. The Area was not hunted for about three years from 2005 when it was acquired to about 2008. In all these years the director was merely investing in Anti-poaching patrols, creation of water points among other things to attract game. This is the kind of effort that was invested in this None Fenced Game Reserve to ensure that we have enough stocks of animals.

Safari Hunting was therefore introduced to help with the conservation and income generation for the area and for the help of re-building. In order to make the community benefit from such animals it was agreed that some revenue can be derived from selling these animals on Safari and the revenue can be used to improve the welfare of the surrounding communities.

We can confirm that Schools, Clinics, Bridges, Grave Roads have been built in the surrounding communities of Nyamvu Game Reserve through the revenues raised from Safari Hunting. The chief has equally had a fair share of some benefits through the construction and periodical renovations of the chief's palace and grading of the road which leads to the palace. Nyamvu further purchased Banana Boats that are used by villagers in the community to cross the Luangwa River when trying to access the other side of the River. School Children, Community health workers are among the beneficiaries who use the Banana boat to cross the Luangwa River.

II. ANTI-POACHING COMPONENT

Nyamvu Safaris maintains three groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Nyamvu Safaris spends about $ 26000 on average per annum to carry out Anti-poaching patrols in the Game Reserve. A total of between 300 and 350 days is recorded per annum. 3000 liters of diesel are used on average per annum which is consumed by 2400 hours of patrol hours. The amount spent on payments for rewards after abducting poachers has been steadily decreasing from 2005 although an average of about 2800 dollars is spent per annum in rewards. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	5650	Directly paid and some subsidies to WA
Scout equipment	9450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	3900	For scouts and WA
Rations for WA and community scouts	3800	
Rewards	2800	For information and arrests
TOTAL	$ 25600	

In the Picture Below two poachers that were apprehended by our Vigilant Scouts.

COMMUNITY PARTICIPATION

A. Community Assistance Component

The agreement that Nyamvu Game Reserve has with the community does not specify what amounts need to be contributed to the community. However on Average, Nyamvu contributes about $ 20000 per annum.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages.

A hammer mill donated to the community by Nyamvu Safaris

B. Conflict Control

Our problematic animals are mainly the Lions and Elephant. Attached are extracts from the media which confirm Lions attacking Human Beings in Nyimba District of Eastern province where Nyamvu Game Reserve is situated. Management of Nyamvu Safaris has set aside a fund which is used to compensate victims of such unfortunate circumstances. The fund is usually 5000 dollars but can be adjusted depending on the number of such occurrences in a particular year.

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain per annum. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the Game Reserve by finding water resource. This usually attracts Lion and Leopard to come and hunt in the game Reserve.

V. OTHER INFORMATION

A. Prey Base

Nyamvu Safaris has been monitoring the population growth of the Lion and Leopard which is a result from efforts done so far such as anti-poaching efforts, water provision, and fire management.Nyamvu Safaris will further engage the wildlife Authorities in Monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Lion and Leopard.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we use to monitor the size and age for Lion and Leopard when Hunting.

C. Elephant Hunting

Our area is endowed with some very good Elephant hunting and due to the long term conservation plan produces good quality tusks now of between 50 and 60 pounds. Our well-coordinated anti-poaching system has made poaching of Elephant in Nyamvu very difficult. The community has also assisted management at Nyamvu by bringing reports of members of the community that have links with suspected poachers and stringent measures have been taking which include imprisonment for those that were found guilty of poaching. Through our various anti–poaching awareness programs with the community we have managed to make the community assist to guard this natural resource jealously. Nyamvu Safaris maintains a policy of not taking any Elephant whose tusks are weighing 20 kilograms and below.

E. Lion Aging Approach

We use the Lion aging approach when conducting Safari Hunting for Lion. Earlier on we mentioned of Human Animal conflicts mainly with Lions. This can be managed by removing the older Lions in the system through Safari Hunting. It has always been a Policy for Nyamvu Safaris not to harvests any Lions or Leopard which are not old enough to have outlived their useful life. In view of this approach not more than five Lions have been taken in Nyamvu game Reserve from the time Safari Hunting was introduced.

F. U.S. Hunters

It is of no doubt that this is the most sought after market with regards to Safari Hunting in Zambia. Nyamvu Safaris has had a number of clients donating equipment and in some instances funds for Anti –poaching programs. This can confirm to you that these hunters are not only after fulfilling their interests but to also allow the community to benefit through a conservative based approach to Safari Hunting.

CONCLUSION

Nyamvu Safaris can proudly confirm that the project which it started in 2005 has been a success looking at the way the numbers of wildlife has increased in our game reserve. We recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: _____

Operator Name: Zaeed Patel

Title: Director

MOPANE SAFARIS, LTD.
Address, 515 FRANCISTOWN ROAD LIVINGSTONE
Operator email: karimtd@yahoo.com

I. DESCRIPTION OF COMPANY AND CONCESSION

Mopane Safaris, Ltd. has been operating in Luembe-West Petauke Concession since April 2015. The concession provides habitat for a range of species including lion, kudu, leopard, buffalo, and elephant. The concession is in Eastern Province of Zambia. The Area is along the Luangwa River and is about 3227 square kilo meters in connection and conjunction with Nyamu Game Reserve our other area. The Area is classified as Secondary Hunting Area. Mopane Safaris has entered into a Ten Year Lease agreement with the wildlife Authority and is renewable subject to conducting successful conservation records of the Ecological system.

Our company is a Limited Company whose Directors are Mr. Saeed Omar Abdul Karim and Mr. Chishimba Mumba. This concession was acquired in April 2015. In view of this Mopane Safaris has one resident Professional Hunter who also provides the functions and duties of a Camp Manager. Other employees include, four game trackers, twelve anti-poaching scouts, and six camp staff (cooks, cleaning, miscellaneous). We estimate a total of about 215 people to be direct beneficiaries from Mopane Safaris employees. These beneficiaries come from the local community.

We very much welcome the donations that are made by some clients from the United States of America as these go a long way in improving the quality of life in these rural communities of Zambia. In most circumstances these communities do not have an economic activity which can assist them raise money for school fees and medication. The only activities which they engage themselves in is farming which is done at subsistence level to only provide for their families. This therefore follows that Safari Hunting provides some economic benefit to these communities as it enable the employees to raise some money to send their children to school, buy School necessities and meet some basic healthcare requirements.

Safari hunting therefore helps not only meet some financial needs of these communities but also prevents them from Illegal Hunting Activities which have adverse effects on the population of the animals. It therefore follows that most of the revenue for Safari Hunting is derived from Hunting of Cats and Elephant. With this in mind Mopane Safaris, the Community and the Wildlife Authorities have an enormous task to prevent the Cats from going into extinction by providing a more robust anti–poaching system to prevent the extinction of cats in these concessions.

II. ANTI-POACHING COMPONENT

Mopane Safaris maintains four groups of anti-poaching teams. Each team consists of three men per team and is equipped with a 4x4 Land cruiser, uniforms and boots, tents, rations, and a satellite phone. The patrols are done in conjunction with the Wildlife Scouts. We supply rations at least twice per month to both the government game scouts and our village scouts to ensure they are sufficiently equipped for the patrols.

Fig I. Director and Resident Professional Hunter of Mopane Safaris Mr.Karim (Center) planning the Anti-Poaching Patrols with a wildlife officer and a member from the community.

Fig ii. In the Picture below some Ivory Tusks recovered from Poachers and weapons used for poaching.

In 2015, Mopane Safaris spent almost $ 30900 in Luembe-West Petauke Consession on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 1450 liters of diesel for patrol vehicles. We recorded 328 patrol days and well above 1968 patrol hours. We also made over $ 2005 in payments of rewards to leads helping in the abduction of poachers. A breakdown of spending on anti-poaching is below.

Item	Spend (USD)	Notes
Scout salaries	11900	Directly paid and some subsidies to WA
Scout equipment	12450	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	1885	For scouts and WA
Rations for WA and community scouts	7800	
Rewards	2005	For information and arrests
TOTAL	$ 36040	

The concession agreement has a clause which requires Mopane Safaris to submit Annual reports on the Anti-Poaching Activities and patrols done in each particular year to the Wildlife Authorities. This report will be taken into account in 2025 whether to renew the concession or not.

III. COMMUNITY PARTICIPATION

A. Community Assistance Component

We make contributions to the community Resource Boards of about $ 25900 annually as per agreement which was entered into 2015 by Mopane Safaris, the Community and the Wildlife Authorities.

In addition to these direct contributions, we pledge to distribute at least 60% of game meat harvested to the villages. In 2015 the value was $ 24371.

Fig iii. Resident Professional Hunter and Director attending a community Meeting.

B. Conflict Control

We usually have reports of problem Animals mainly Elephants destroying crops for villagers and Human Animal conflict from Lions. $ 12000 has been set aside for compensation purposes when we have such occurrences. In 2015 we paid $ 1000 in compensation to maize fields that were damaged by Elephants to grain fields for Villagers. We further compensated a family whose member was attacked and killed by an Elephant and was one of our Village Scouts who had gone out of camp and on returning to camp the incident occurred. The total cost for compensation and funeral arrangements was $ 2500

IV. HABITAT PROTECTION AND CONSERVATION DEVELOPMENT

We have developed the water infrastructure for the exclusive use of wildlife in our concession. The infrastructure developed so far is natural pans which costs approximately $5000 to maintain in 2015 and 2016 respectively. The increased water supply increases the carrying capacity of the concession and the lion's prey base due to more game residing in the concession by finding water resource. The concession is along the Luangwa River and this makes it have smaller streams flowing in the concession creating more water points for animals. As a result we have a lot of Game in our concession which attracts Lion, Elephant and Leopard.

V. OTHER INFORMATION

A. Prey Base

Mopane Safaris in Luembe-West Petauke is still monitoring the population growth of the Lion, Leopard, Elephant and other species which will result from efforts done so far such as anti-poaching efforts, water provision, and fire management. Mopane Safaris will further engage the wildlife Authorities in monitoring the resources on the ground by position cameras in strategic Areas so as to monitor the Activities of the Game and Cats. Luembe is a secondary Area and as such we have applied more concerted efforts aimed at mitigating the impact of poaching that had characterized the Area for the years when we were not operating in the Area.

We also engaged the wildlife authorities to regulate resident Hunting by proposing that resident Hunting be temporarily stopped for five years so as to give room for animals to breed so as to improve the numbers in the Eco system in Luembe Game Management Area.

B. Lion Population Tracking

Lion is not easy to track and as such we are still developing tools which we will use to study the population of Lon in our Area. As at now we use Lion tracks and foot prints. Sightings by individuals and just the a few cameras which we used this year to monitor the size and age for Lion and Leopard.

C. Lion Aging Approach

Like other Safari Companies we have been following an age-based policy for African lion trophies since 2015, after adopting a mutual aging agreement with our wildlife Authorities, and to be conservative in estimating age.

A number of potential Lion Trophy were not hunted this year because of our company policy and selectiveness.

Our approach as a company from 2015 until 2025 when our concession will be due for renewal is to hunt Lion which has reached an advanced and mature age only of 6 years and above.

D. Elephant

Elephant Hunting in Luembe is also one of the High Income earners. Mopane Safaris is alive to the fact that Ivory is of high value on the world market and is on high demand in particular the Far East. Mopane Safaris therefore has put up a robust Anti-Poaching program to protect this rare species. In view of this we have a policy as company not to harvest any Elephant with Tusks weighing below 20 kilograms. We recognize the fact that it may be difficult to judge but we expect the Professional Hunters to exercise caution and use their judgment before allowing a client to hunt one. Professional Hunters have been given an allowable allowance of 1 kg so as not to go below the recommended threshold by the wildlife authorities of 15 Kilograms as a minimum shoot able size Elephant.

E. U.S. Hunters

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

CONCLUSION

Mopane Safaris regulated, sustainable-use based hunting program enhances the survival of the Lion, Leopard and Elephant and we recognize that the Cat and Elephant hunts bought and booked by our American Clients contribute a higher percentage of income in the Safari Hunting and it is our obligation to share these finances with the communities who have played an important role to conserve this resource. We also realize that these species are a renewable resource and as such we will endeavor to provide suitable conditions for the reproduction and sustainability of these species with the allowance of our American Clients to keep coming and hunting the different species in Africa.

Signed: _____

Operator Name: Saeed Karim

Title: Director

RE: Zambian Operators Enhancement Report Summary

INTRODUCTION

This is a summary report of the individual "Operator Enhancement Reports" provided by four Zambian hunting operators. The reports detail the individual operator's anti-poaching, community investment, habitat protection, animal conflict control, and other important information. This report compiles that data to ensure the confidential of the sources for commercial competition purposes.

The reports were provided by a sample of four Zambian safaris operators. They manage four hunting areas covering 10,028 km^2. The anti-poaching, community development, and other figures explained in this summary report far under represent the full benefits provided by hunting operators in Zambia.

ANTI-POACHING

All four operators deploy anti-poaching units in their concessions. Anti-poaching operations are conducted year-round and teams are deployed several times per month. The teams range from three to five members. Of the three operators reporting, at least 991 anti-poaching days were conducted in 2015 (2.71 years of anti-poaching patrols). The operators provide fuel and rations to government and community scouts and coordinate with these scouts to ensure complete coverage. Moreover, the operators keep their anti-poaching teams motivated by providing them with rewards for contraband seizures and poacher arrests.

Two of the four companies keep records of poacher arrests and seizures. In 2015, one operator recorded 94 snares collected, and 28 muzzleloaders and seven shotguns confiscated. In 2016, another operator recorded over 1,000 snares and 40 gin traps collected, 10 poachers arrested, and three bicycles, five muzzleloaders, and 14 miscellaneous weapons confiscated.

Operators fund their anti-poaching through their hunting revenues and secondarily from client contributions. Anti-poaching expenses reported by the operators include: vehicle fuel, rations, salaries, clothing, vehicle repair, phones, tents, support to Wildlife Authority, and rewards. In 2015 alone, the four operators spent $201,900 on anti-poaching. None of the operators reported any serious habitat related destruction.

COMMUNITY DEVELOPMENT & OTHER SOURCES OF COMMUNITY EMPOWERMENT AND ASSISTANCE

The four operators provide assistance in the form of direct and ancillary support to the communities. Doing so incentivizes the communities to protect wildlife and not retaliate in instances of human-wildlife conflict.

In 2015, the operators contributed $99,900 to the villages located in their hunting areas. These contributions took the form of school renovations, village government infrastructure support, funding youth sports league, paying teacher salaries, sponsoring school fees for

impoverished children, digging new boreholes and providing pump stations, funding transportation for children to attend school, and medical support to the communities, among other things.

Protein malnutrition is a serious threat faced by many rural Zambians. Furthermore, bushmeat poaching is indiscriminate and damaging especially on prey base species. To combat both protein malnutrition and indiscriminate bushmeat poaching, all four operators donate legally harvested meat to the communities. On average, the four operators report donating 55% of the annually harvested animals to the communities. Two of the four operators report the value of the game meat donated to the villages being $51,871 in 2015.

The operators also support the communities by providing full-time and part-time employment. The four operators report hiring full-time employment of 89 camp staff and 71 anti-poaching scouts. The full-time employees are sourced from the local communities, thus extending the benefits to dependents. The operators report 1,128 community members being dependent on the employment provided by the operators. Lastly, one operator reports hiring 130 additional community members for temporary employment each year.

ADDITIONAL INFORMATION

HABITAT PROTECTION

Three of the four operators report providing water infrastructure for the exclusive use of wildlife in their hunting areas. The habitat set aside for hunting is crucial for lion conservation as it would otherwise be at the disposal of communities for agricultural and livestock use.

WILDLIFE CONFLICT CONTROL

All four operators have a conflict control program in place with the communities. Communities are trained and provided with equipment to deal with crop raiding wildlife in a non-harmful manner. All of the operators also have funds to compensate villagers for lost crops, injured or killed family members as a result of wildlife, and lost livestock.

OTHER LION ENHANCEMENT INFORMATION

All four operators report monitoring lion. The most common form is compiling pictures from trail cameras of lion on bait and entering lion sightings and tracks onto GPS. Information is transmitted between the company and the Wildlife Authority. By using trail cameras, the operators can identify and more accurately age male lion to ensure they comply with new aging regulations.

CONCLUSION

The sampled Zambian hunting operators provide lion enhancement by addressing the three primary threats to lion survival: loss of prey base, loss of habitat, and human lion conflict.

In 2015 alone, the four operators invested $201,900 on anti-poaching. Anti-poaching directly combats loss of prey base by apprehending poachers, monitoring the concessions, and collecting indiscriminate snares and gin traps.

Community development plays an essential role in incentivizing the communities in protecting the wildlife and habitat. The operators compensate the communities in various ways. In 2015, the four operators contributed $90,900 directly to the communities. Furthermore, the operators provide an essential source of full time and temporary employment as well as game meat donations to dissuade poaching and provide essential protein.

In short, the attached reports demonstrate that licensed, regulated hunting in Zambia enhances the survival of lion in the wild.

Operators Reporting:

- Kwalata Safaris, Ltd.
- Mopane Safaris, Ltd.
- Muchinga Adventures, Ltd.
- Nyamvu Safaris, Ltd.

MAR 2 7 2018

(b) (6) [redacted]

(b) (6) [redacted]

Date 03/19 20 18

PAY TO THE ORDER OF US Fish + Wildlife Service $ 100.00

One Hundred + 00/100 DOLLARS

FirstBank Southwest Amarillo

MEMO Lion Target Permit Application

(b) (6) [redacted]

CONSERVATION FORCE

A Force for Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay
† Bert Klineburger

BOARD OF DIRECTORS:
John J. Jackson, III, J.D.
Chrissie Jackson
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Shane Mahoney
Renee Snider

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

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

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 application for a permit to import a threatened-listed, wild-managed African lion trophy from South Africa.

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 be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion 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: Matthew Morgan

Date: 2/20/18

MAR 15 2018

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

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Morgan	Matthew	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)		None.	

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		N/A	N/A

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)
N/A	

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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Grosse Pointe Farms	MI	(b) (6)		U.S.

2.a. Mailing Address (include if different than physical address; include na
(b) (6)

2.b. City	2.c. State	[illegible]	2.e. County/Province	2.f. Country
Warren	MI	(b) (6)	(b) (6)	U.S.

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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ 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] 2/20/18
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.

      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: Coenraad Vermaak Safaris Hilton South Africa
   b. Date wildlife is to be hunted: July 11th - 18th 2018
   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 for Life Size Mount - Skin, Skull, teeth, 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):

   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:	Dieter Ochsenbein
Business Name:	Highveld Taxidermists
Address:	Farm 354
Address:	Vlakplaats
City:	Hennopsriver 0023
State/Province:	South Africa
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.

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: _____

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.

Subject: FW: lioness
From: "Hans - Coenraad Vermaak Safaris" <hans@cvsafaris.co.za>
Date: 2/19/2018 8:56 AM
To: "'John J. Jackson, III'" <jjj@conservationforce.org>, "'John J. Jackson, III'" <jjw-no2@att.net>, "'John J. Jackson, III'" <cf@conservationforce.org>
CC: "'Robyn Worthington'" <info@cvsafaris.co.za>

Hi John, here is the motivation to hunt 1 possibly 2 lionesses at Khamab this year. Let me know if this will cover what is required by USFW? John, have you heard from Matt Mouron?

Note below from Hanno, the reserve ecologist.

Hi Scruff and Johan

Attached the motivation for the hunting of the lioness. I think this should be sufficient as it describes in detail how it fits in with the National lion BMP as well as the KKR lion management plan.

Scruff, let me know if anything else is needed from our side for now?

I have spoken to the Northwest Conservation officials and the permit should not be any problem as we are one of the 4 approved reserves.

Best regards

Hanno

Hanno Kilian

Reserve ecologist

Khamab Kalahari Reserve (Pty) Ltd.

e-mail: ecologist@khamab.co.za

Cell: 082 851 7296

Scruff

Coenraad Vermaak
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Attachments:

Motivation for hunting of lioness 2018.pdf	64.0 KB

MOTIVATION FOR THE HUNTING OF AN ADULT LIONESS ON KHAMAB KALAHARI RESERVE

Prepared by Hanno Killan, Reserve Ecologist, Khamab Kalahari Reserve.

E-mail: ecologist@khamab.co.za

A Biodiversity Management Plan (BMP) for the African lion (*Panthera leo*) in South Africa was published for implementation in December 2015 in accordance with the National Environmental Management: Biodiversity Act (10/2004) (Gazette no. 39468). The wild managed lion metapopulation is one of three recognised lion populations in South Africa, the other two being the wild lion population and the captured lion population (BMP). The wild managed lion population typically occurs in fenced game reserves that are typically <1000km^2 in size. Fencing of reserves is seen mostly in South Africa, and few fenced reserves are seen in the rest of southern Africa. There are various pro's (Packer et al 2013) and con's (Creel et al 2013) of using fencing as hard boundaries of game reserves, but the reality is that fencing is unfortunately an essential component of lion conservation in the future as habitats get more fragmented (Riggio et al 2013) and human populations pushing towards boundaries of conservation areas. The managed lion population could therefore be an important example of conservation of lions in a changing African context.

However, because of the fragmented nature of the fenced reserve, the conservation value of these populations has been questioned (Slotow & Hunter 2009). Furthermore, management of these fragmented and isolated populations create problems as many of the natural processes that occur in large naturally functioning lion population were disrupted in the small fenced reserve. As it is almost impossible to restore these processes on these fenced reserves, another approach is needed. The approach that has been adopted to overcome these problems is to mimic the outcome of these natural processes through management interventions (Miller et al 2013) in a metapopulation approach (Selier & Ferreira 2017).

Disruption in social dynamics were identified as one of the key drivers of challenges in managed wild lion populations, of which rapid population growth and degraded predator-prey relationship are the most important (BMP). It is some of the basic biological characteristics of lions where the opportunity lies to mimic behaviour and dynamics of lion prides. These characteristics include ages of first breeding, litter intervals, cub survival, litter sizes, female dispersal and age of last breeding (Miller et al 2013). Several suggestions have been identified on how to mimic the outcomes for natural processes, which includes contraception, unilateral tube tying, translocations and removal of females, which are all recognised by the by the Lion Biodiversity Management Plan for South Africa (BMP).

To mimic the social and population dynamics of females and maintain an average pride size of four females, one or more of the following five management options are recommended:

1. Increase the age at first reproduction using contraception of sub-adult females;
2. Establish longer intervals between births using contraception of adult females;
3. Reduce age specific fecundity through reduced litter sizes using unilateral tube-tying of fallopian tubes;
4. Mimic female dispersal by removing as well as introducing sub-adult females at infrequent irregular intervals (on average once every 5 to 10 years);
5. Mimic higher death rates of old females by removing (through hunting/translocation) the oldest females (typically >10 years of age) in the pride.

The lion management plan of Khamab Kalahari Reserve (KKR) (Kilian 2016) has identified the same possibilities to mimic behaviour and population dynamics as those specified in the National BMP. However, in the lion management plan of KKR, the restoration of some of the biological process involved in lion dynamics are given priority above mimicking of the natural control mechanisms, which are far more invasive and management intense. Here mimicking especially refers to the use of contraceptives and other birth control options like unilateral tube tying or removal of ovaries. The restoration of biological process in lion populations would involve managing the population in such a way to promote natural pride structures, as well promoting male lion turnover, and facilitating the presence of roaming bachelor male coalitions on the reserve.

One of the problems identified with managed wild lions is the inclination of adult females to become loners (Miller et al 2013) and not associate in pride structures. This especially disrupts predator-prey dynamics, which results in an increase in overall predation, which can be a problem on fenced reserves. This has been flagged as a potential problem in the lion management plan of KKR, and which is something that was specifically highlighted as something that must be avoided (Kilian 2016). The female offspring of lone lionesses also tend to develop into lone females when they grow up (pers obs), which exacerbate the problem even further.

The KKR management plan suggests that females that spend more time on their own (or with their own offspring only) than with other lion groups, should be removed from the population to promote the development of stronger pride structures, as is the case in wild lion populations. These females can then either be removed through translocation if there are translocation options available, removed through hunting if they don't have dependant cubs, or euthanised as last resort.

Where translocation is not an option, trophy hunting can be a valuable meta-population management tool for South Africa's managed wild lions in the following instances (Seller & Ferreira 2017):

a. Removal of the oldest females (typically >10 years of age) in the pride to mimic higher death rates of old females.
b. Removal of sub-adult males (typically 2-4 years old) to mimic male dispersal.
c. Removal of the dominant male/s every 3 years to mimic pride take-overs.
d. Removal of oldest males (typically >8 years old) to mimic higher death rates of old males.

KKR has identified three lionesses that the fits the criteria of spending more time on their own than with other lions in a pride, and therefore do not form part of any pride. As per the KKR lion management plan (Kilian 2016), these lionesses should be removed from the population by one of the means identified above. Furthermore, it also coincides with the option above of mimicking higher death rates of older females as a management tool in the lion meta-population as identified by the BMP.

Options for the removal through translocation of older (10yr) adult females are extremely rare, and any possible translocation option will be pursued if they become available. KKR has decided to make at least one of these females available for hunting in 2018. This, however, will be dependent on her not having cubs at the time of the hunt, or not associated with a pride at that stage.

KKR is one of four reserves that were identified by the Scientific Authority and recognised by the Department of Environmental Affairs (DEA) as reserves where hunting of managed wild lions can take place. Hunting of lion forms an integral part of the management toolbox of the lion management plan on KKR, together with live removals and translocations, as well as the restoration of natural processes and conserving genetic diversity.

The removal of these old lionesses will benefit the lion population as a whole as it forms part of the process that KKR embarked on to restore natural lion social dynamics, and at the same time reducing the predation impact of the lion population on the game population of KKR. Hunting of one of these lionesses will therefor only have positive impact on the lion population, while also providing additional income to the reserve to assist in managing the reserve and its animal populations in a responsible and sustainable manner.

References

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Vannorman, Tim <tim_vannorman@fws.gov>

South Africa Lion Properties

1 message

Mpho Tjiane <MTjiane@environment.gov.za> Wed, May 31, 2017 at 2:29 AM
To: "tim_vannorman@fws.gov" <tim_vannorman@fws.gov>
Cc: Craig Hoover <craig_hoover@fws.gov>

Dear Tim

Please note the attached lion properties that are approved by our Scientific Authority as contributing to Conservation.

Please note we have removed the reserves that do not hunt lions and added one new one. If you receive an application with none of these properties please contact us for verification.

Regards

Mpho Tjiane

Deputy Director: CITES Policy Development and Implementation

Biodiversity and Conservation

Private bag X447,Pretoria

Environmental House,473 Steve Biko, Arcadia

Pretoria 0083

Tel: +27 (0) 12 399 9596 Fax: +27 (0) 012 359 3604

Cell 0839806409 Email: mtjiane@environment.gov.za

Call Centre No: +27 (0) 86 111 2468 website www.environment.gov.za

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South African Lion Properties eligible for Hunting 2016.xlsx
12K

Name of place	Province	Area (ha)	Ownership
Kalahari Oryx Private Game Reser	Northern Cape	86,948	Private
APNR	Mpumalnaga	170000	Private
Mapunbubwe Game Reserve	Limpopo	19 000	L. Ramqeuist
Khamab Kalahari Reserve	North West	90000	Private

Landowner	Ecologist/ Manager Contact details	Purpose
Dr C.H. Wiese	Mr. Johan Maritz (General Manager), Cell +27 83 406 9729, johan@kalahari-oryx.com	Conservation
Various: KPNR	Colin Rowles (Manager) Klaserie Private Nature Reserve	Conservation
Various: TPNR	Bryan Havemann (Warden) Timbavati Private Reserve	Conservation
Various: UPNR	Mark Shaw (Reserve Representative)Umbabat Private Game Reserve	Conservation
Various: BPNR	Craig Spencer (Warden) Balule Nature Reserve	Conservation
E. Small	079 524 1635	Conservation
J. Odendaal	Mr Hanno Killian - Cell 082 770 2838, ecologist@khamab.co.za , Mr J. Odendaal (Manager): 082 375 9381	Conservation

Nature of population	Method of enumeration	Numbers
Free range, extensive	Known individuals	25-35
Free range, extensive	Census	62
Free range, extensive	Census	69
Free range, extensive	Minimum known numbers	21
Free range, extensive	Minimum known numbers	58
Natural free roaming small populati	Minimum known numbers	Approx 12
Free range, extensive	Known individuals	28

MAR 15 2

MATTHEW T. MOROUN

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